

Appendix J

Steve Hildebrand/USFWS



Whitetail deer

Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Assessment for Canaan Valley National Wildlife Refuge

- Introduction
- Summary of Comments Received

Introduction

In May 2010, we completed the draft Comprehensive Conservation Plan and Environmental Assessment (draft CCP/EA) for Canaan Valley National Wildlife Refuge. That draft outlines four alternatives for managing the refuge over the next 15 years, and identifies alternative B as the “Service-preferred Alternative.” We released the draft for 45 days of public review from June 1 to July 16, 2010.

We evaluated all the letters and e-mails we received and the oral testimony we recorded in our public hearings during that period. This document summarizes the public comments that raised issues and concerns within the scope of this final CCP and our responses to them. Based on our analysis in the draft CCP/EA and our evaluation of those comments, we have modified alternative B. These modifications take the form of additions, corrections, or clarifications, which we have incorporated into this final CCP. We have also determined that none of these modifications warrants our publishing a revised or amended draft before publishing the final CCP.

There are some important changes in the final CCP:

- (1) A new map, labeled “Map 4.2, Public Use”, and located in Chapter 4, clarifies our proposal to connect the Swinging Bridge Trail to Cortland Road. This proposed trail connection will require further NEPA analysis and public review before a final route is selected. Therefore, the new map in the final CCP shows the general area within which we hope to build this trail connection, rather than an actual line on a map, as was shown in the draft CCP/EA.
- (2) In the final CCP, we will work with WV Department of Highway (WVDOT) to develop a plan for improving Camp 70/Delta 13 for access by pedestrians, biking, horseback riding, *and vehicles* (see the final CCP, Chapter 4, objective 4.3). Vehicle access on Camp 70 was proposed in alternative C of the draft CCP/EA, but not in alternative B. Due to public comment in support of vehicle access on this road, we decided to include this action in the final CCP. Although we discussed some of the potential impacts of this action in the draft CCP/EA, we will need to conduct additional detailed analysis on this action before it is implemented.
- (3) In the final CCP, we changed the language of objective 3.1 to state that 75 percent of the 114 acres of aspen woodland will be managed in the 0-15 year age class. We removed language in the strategies identifying the annual target for cutting and replaced this with a statement that identifies the aging nature of the 114 acres of aspen communities requiring accelerated management if these communities are to be maintained as aspen habitat. We also included language in objective 3.1 that identifies the need for the management and conservation of aspen communities not identified in the CCP due to limitations of existing vegetative mapping coverage.
- (4) In the final CCP, we changed language in objective 3.2, regarding northern hardwood forest edge cutting, so that no annual limits are put on this type of cutting. Limitations presented in the draft CCP/EA reflected considerations for available personnel to conduct activities during the appropriate seasons as well as seasonal access restrictions. However, given previous conversations with WVDNR and other partners, we believe that opportunities exist to help achieve management of this habitat over the life of the CCP. As such, the refuge will not state maximum annual acres, which would limit our ability to conduct hardwood forest edge cuts and would limit opportunities to work with partners over the life of the CCP.
- (5) In objective 3.3 of the final CCP, we moved the identification process for dry alder communities to the 1-3 year time frame to prioritize locations for effective alder management. These dry alder communities will be identified prior to any habitat management plan.

Our Regional Director will sign a Finding of No Significant Impact (FONSI) (appendix K), which certifies that this final CCP has met agency compliance requirements, and will achieve refuge purposes and help fulfill the Refuge System mission. It also documents his determination that implementing this CCP will not have a significant impact on the human environment and, therefore, an Environmental Impact Statement (EIS) is not required. We will make these documents available to all interested parties. Implementation can begin immediately.

Summary of Comments Received

Because of the volume of comments we received and our interest in an objective analysis of them, we enlisted the U.S. Forest Service (the Forest Service) Recreation Solutions Enterprise Team in compiling a database and preparing a summary report. That team has particular expertise in providing unbiased summations of public comments on major proposals by Federal land management agencies, a process called content analysis. The team evaluated and coded all of our public letters, e-mails, and transcripts. We posted the summary report, which sorts the comments into subject headings by issue, on the website <http://www.fws.gov/northeast/planning/Canaan%20Valley/ccphome.html>. Our responses below follow the organization of their report, and we encourage a reading of it before reading our responses.

During the comment period, we received 312 responses, both oral and written. Organized response campaigns (forms) represent 35 percent (111) of that total.

We gathered oral comments in the following seven formal public hearings:

Tuesday, June 15, 2010, 2-4 p.m. and 6:30-8:30 p.m. in Canaan Valley, WV
Wednesday, June 16, 2010, 2-4 p.m. and 6:30-8:30 p.m. in Parsons, WV
Thursday, June 17, 2010, 2-4 p.m. and 6:30-8:30 p.m. in Elkins, WV
Monday, June 28, 2010, 6:30-8:30 p.m. in Davis WV.

Approximately 150 people attended the public hearings; 80 presented oral testimony, which we recorded and later transcribed. Some who attended the hearings submitted their comments in writing instead of as oral testimony, while others did both. We received written responses in 140 letters (some of which we also received as email), 90 e-mails, 1 fax and 1 telephone conversation.

We received comments from these government agencies and elected officials.

Mayor of Davis, West Virginia
Paul Burns, Tucker County Assessor, West Virginia
Pennsylvania Game Commission, Bureau of Wildlife Management
State Congressman, 46th District, WV House of Delegates
State Senator, 14th District, WV State Legislature
Tucker County Planning Commission, West Virginia
Governor's Office, West Virginia
West Virginia Division of Natural Resources
West Virginia Division of Culture and History

We also received comments from these individual or organizations:

8 recreational/conservation organizations
6 recreational associations
5 preservation/conservation organizations
4 businesses
1 hunting and fishing sports clubs
1 civic organization

In the discussions below, we address every comment the Forest Service report identifies. Occasionally, the Forest Service placed the same comment under two or more subject headings. In our responses, we often refer the reader to other places in this document where we address the same comment. Under a few subject headings, we introduce more detail on an issue than the Forest Service report provides. That was simply a matter of our knowing the issue in greater detail, or our having conversed with the person who submitted the comment.

Directly beneath each subject heading, you will see a list of unique letter ID numbers that correspond to the reviewer letters. The cross-referenced list appears as attachment 1 to this appendix.

In several instances, we refer to the full text version of the draft CCP/EA, or the final CCP, and indicate how the final CCP reflects our proposed changes. You have several options for obtaining the full text version of either the draft CCP/EA or the final CCP. They are available online at <http://www.fws.gov/northeast/planning/Canaan%20Valley/ccphome.html>. For a CD-ROM or a print copy, contact the refuge headquarters at:

Canaan Valley National Wildlife Refuge

6263 Appalachian Hwy.

Davis, WV 26260

Phone: (304) 866-3858

Fax: (304) 866-3852

E-mail: Canaanvalley@fws.gov

1.0 Planning

1.1 NEPA Process

(Letter ID#: 137)

Comment: There was one comment about the NEPA process. This came from a public hearing and may actually have been a response from a panel member. At times the participants were not identified. In general the comment was concerned with adherence to NEPA and the need to follow its guidance.

Response: No response required.

1.11 Public Involvement

(Letter ID#: 60, 68, 69, 70, 81, 84, 97, 126, 127, 131, 135, 142, 146, 147, 148, 149, 154, 164, 179, 194, 201)

Comment: Over twenty people commented on public involvement and generally wanted the refuge to continue to or enhance their efforts to keep people informed of its activities and intentions. One person suggested a newsletter; others suggested open houses; others suggested more meetings; and still others suggested field trips. One person also mentioned they knew about the refuge trail proposals for a long time and challenged folks who thought the refuge didn't work hard enough to inform the public.

Response: We will strive to do all we can to increase and enhance communication with the general public. Goal 5 in the final CCP provides details on how we plan to do this over the next 15 years.

1.12 Comment Period

(Letter ID#: 27, 30, 60, 73, 74, 115, 116, 117, 133, 153, 179, 186, 188)

Comment: Thirteen individuals wanted the comment period extended. Nearly all felt that due to the length and complexity of the document; 45 days was simply not enough time to thoroughly read the document and then contemplate and develop comments. One person wanted a summary of how the comments would be categorized and others wanted to know how the comments would be weighed or utilized by the Fish and Wildlife Service.

Response: We understand and appreciate the public's concern about the time limitations for submitting comments, given the length and complexity of the document. For this reason, we developed an Executive Summary of the document as well as summary tables to help readers sift through draft CCP/EA. We feel that this effort, coupled with the seven public meetings that we offered, should have enabled members of the public to submit comments within the allotted 45-day comment period.

The introduction to this appendix summarizes how comments were categorized and how they were utilized. The Service does not "weigh" comments.

1.13 Request for Information or Meeting

(Letter ID#: 6, 22, 28, 29, 30, 31, 32, 37, 61, 97)

Comment: Several people asked for a CD or hard copy of the Canaan draft CCP/EA. Several others wanted better copies of the maps or figures or tables contained within the document. A few individuals simply asked to be kept informed about the progress and decisions made during the CCP planning process.

Response: We have accommodated all requests for paper and electronic copies of the draft CCP/EA. We will do our best to continue to keep interested persons informed as we take steps towards implementing the final CCP.

1.2 Document (Clarity, Technical, Editorial, Availability)

(Letter ID#: 13, 22, 29, 60, 74, 75, 132, 133, 171, 175, 205)

Comment: One person commented that the document was informative and educational. One respondent wanted a table within the document listing the trust species. Many people requested better quality maps and figures stating that the maps and figures in the document were inadequate. Many people were very concerned with the refuge's proposed trail route near private property and wanted to know where the trail would actually be located.

Response: We appreciate the comment about the document being informative and educational. Appendix A of the draft CCP/EA and of the final CCP lists the "Species of Conservation Concern". We acknowledge that the maps and figures posted online were difficult to read due to low resolution. However, we chose to post low resolution files so they would be easily downloaded. We responded to all requests for better quality figures and maps.

We acknowledge that many people were concerned about a proposed trail from Swinging Bridge to Cortland Road which may have appeared to run through private property, as it was shown on the public use map for alternative B in the draft CCP/EA. This proposed trail will require further NEPA analysis and public review before a final route is selected. Therefore, the map in the draft CCP/EA was only intended to show a general route for this proposed trail. For the final CCP, we have developed a new map which shows this trail as more of a concept rather than a definitive route. We apologize for this error.

Comment: Some specific comments about the document clarity were: "One of those, for instance, is regarding the partnership with the Beall Weather Station (sounds like) on the Beall tract and it references that having (inaudible) and NOAA (sounds like) data collection. That hasn't been the case since 2007. And so I'm just wondering...you know, there is that and another statement about...one of the plans indicates that the refuge would work with CVI to create an ADA accessible fishing platform along the Camp 70 road or on refuge property. There is an ADA accessible fishing platform already on Camp 70 road. So I'm just wondering about, you know, the accuracy of the statement about the NOAA site as well as with the fishing platform. Does that mean you are proposing to put another one or you overlooked that there is one there? You know those are two...Things that are down there that I have already noticed. There may be others, there may not. So maybe the question with that is, what is the process for ensuring the accuracy of the information generally?"

Response: As we explain in appendix B of the final CCP, the National Oceanic and Atmospheric Administration (NOAA) weather station was installed in 2000 on the Beall Tract. The purpose was to establish and use an air quality monitoring and research site by the National Oceanic and Atmospheric Administration (NOAA). The equipment on this site continues to gather information such as carbon dioxide flux, air temperatures, soil temperatures, and soil moisture at various depths. Equipment for mercury monitoring has been moved to Canaan Valley Institute (CVI) land.

We have decided to remove the strategy from the draft CCP/EA, Alternative B, that reads, "Work with Canaan Valley Institute (CVI) to construct an ADA-compliant fishing platform on Camp 70 Road, on the Service's property or on CVI's property." Since the refuge now has an ADA-compliant fishing platform on Timberline Road, and CVI has an ADA-compliant fishing platform on Camp 70 Road, we have decided not to proceed with a third ADA-compliant fishing platform on the refuge at this time.

The draft CCP/EA goes through an internal review process as well as a public review process. Both these processes provide opportunities for checking the accuracy of the document before the final CCP is compiled and distributed. Although we always strive for 100 percent accuracy in all our documents, this is not something we can guarantee.

Comment: The same respondent also wrote: “And some grammatical and/or typographic errors I noticed in the full document:

Pg 2-6 4: Elkins is located in the northern tip...

Pg 2-7 2: Parsons is located...on the Shavers Fork...

Pg 2-14 3: Forrest is misspelled.

Page 3-13: photo caption: Prescribed burnv is misspelled.

Page 3-84: Bullet 8: Map B-4 is referenced when it should be Map B-2 on page B-58.

Page 4-38: photo caption: You probably mean electrofishing, and where is crayfish run??

Page B-27: Refuge Manager costs referenced (\$1360.00 for five work days) contradict those costs referenced on page B-47 (\$450.24 for one work day – which would equal \$2251.20).

Page B-38 3: I think the Cheat Mountain Salamander is active when surface temperatures are above 55°F not 550F.

Appendix A Cover Page: What is “Umbagog Lake”? Should this caption be “Cheat Mountain Salamander”? Perhaps the Umbagog National Wildlife Refuge CCP was used as the template for this CCP and this text change was overlooked.”

Response: The above errors were corrected in the final CCP.

Comment: One respondent wanted the refuge to document its claims or findings:

- Page 2-38: Wildlife –Dependent Recreation: Please document the sources (in an easy to read table form) for the 20,000 number referenced as the number of people visiting the refuge each year.

Response: This number is an estimate based on partial data that includes Visitor Center visits, White Grass Ski Touring Center visits, hunter days, and two traffic counters that operate part of the year. This data is pooled together and is used to make an educated estimate on the number of annual visits to the refuge. This is also the number that is used in the refuge’s annual reports.

- Page 2-38 through 2-43: Educational and Recreational Opportunities: Please document within this section the FWS policy for Interpretation, Fishing and Environmental Education as you have for Wildlife Observation and Photography and Hunting.

Response: We were able to document the guiding principles for everything except Interpretation, because the policy does not list any guiding principles for Interpretation on refuges.

- Page 2-38 and 2-43: Wildlife Observation & Photography and Hunting: Both of these opportunities share similar guiding principles yet they are handled very differently within all of the management alternatives. This is most obvious with unlimited off trail access for hunting, yet no off trail access or very limited off trail access for Wildlife Observation & Photography as proposed in Alternative C. Please provide the process and/or science for this management direction. Off trail access for any compatible pedestrian purpose during the same seasons for which off trail pedestrian access for hunting is deemed compatible and justified would have the same, or less, impact to the environment, including its habitats and wildlife, as hunting.”

Response: Although we proposed in alternative C of the draft CCP/EA to allow limited off-trail access, we did not include this proposal in the final CCP. We understand the argument that if off-trail access is allowed for hunting, it should be allowed for wildlife observation and photography. However, we believe we could not offer a high-quality hunting experience without offering off-trail access, whereas we can, and do still offer a high-quality wildlife observation and photography experience without off-trail access. The process for this management direction is documented in the compatibility determination for Wildlife Observation, Photography, Environmental Education, and Interpretation, and in the compatibility determination for hunting, all located in appendix B.

1.3 Service and Refuge System Policies

(Letter ID#: 42)

Comment: One person commented that the time frame for policy implementation should be shortened from five years to two years.

Response: We strive to establish reasonable timeframes for accomplishing actions in the CCP. A two-year timeframe for implementing policy is not always reasonable. Therefore, we will not make any changes to the timeframes related to policy implementation.

1.4 Refuge Operational Plans (Step Down Plans)

(Letter ID#: 75, 95, 111, 113, 116, 134, 175)

Comment: Commenters wanted a detailed HMP to be in place to guide refuge silvicultural practices. Others wanted a plan to address future public access needs. Another commenter wanted to know what things within step down plans could be implemented and if there was a schedule for those details. Yet another commenter wanted to know why there wasn't a wildlife management plan yet after 15 years of refuge operation. One person asked if the refuge consulted for their forest management goals.

Response: Chapter 1 of the final CCP lists all the step-down management plans that are either up-to-date or that need to be completed. Step-down plans that have gone through the appropriate approval process are currently being implemented according to the timeframes laid out in each plan.

The refuge does, in fact, have a plan that guides wildlife and habitat management. Refuges operate from annual habitat management plans designed around the most recent station management plan, Environmental Assessment or Environmental Impact Statement guiding the management of refuge habitats. Annual management plans outline locations and acreages of habitat manipulations such as shrub and grassland mowing and are reviewed and approved annually by the refuge manager. This process will continue after the CCP only with the new added guidance of the refuge's new management plan as described in the preferred alternative.

The refuge did, indeed, consult biological experts to help develop forest management goals.

1.5 Plan Amendment and Revision

There were no comments in this category.

1.6 Comprehensive Conservation Planning Process

(Letter ID#: 106, 131, 143, 152)

Comment: Several people commented that they appreciated the refuge's effort in the planning process and felt the plan had something of benefit for everyone. One person wanted to know if this was the first stage in the plan development. Another person wanted to know who makes the ultimate decisions concerning the plan.

Response: We are pleased that some people feel this plan is beneficial. This is not the first stage of plan development, but rather the culmination of several years of gathering public and expert input and developing the plan. As we explain in Chapter 2 of the final CCP, our Regional Director makes the ultimate decision by signing a Finding of No Significant Impact (FONSI), which certifies that this final CCP has met agency compliance requirements, and will achieve refuge purposes and help fulfill the Refuge System mission. It also documents his determination that implementing this CCP will not have a significant impact on the human environment and, therefore, an Environmental Impact Statement (EIS) is not required. The FONSI is attached to the final CCP as appendix K.

1.7 Purpose and Need

There were no comments in this category.

1.71 Vision

(Letter ID#: 3, 14, 41, 52)

Comment: Less than five people commented on the refuge's vision for the future. Respondents encouraged the refuge to continue to be good stewards and to actively manage the lands entrusted to it. One commenter was concerned that the refuge was having a paradigm shift in its basic mission statement.

Response: We appreciate the encouragement to be good stewards, and we disagree that the refuge is undergoing a paradigm shift in its basic mission statement.

1.72 Goals

(Letter ID#: 13, 53, 60, 99, 175)

Comment: A few people commented on refuge goals. One person complimented the refuge on its lofty goals and felt that strategies should be prioritized. An opposite viewpoint was expressed by a respondent who felt the refuge goals sounded contradictory and sounded like an opportunity for over manipulation. Another person felt that management should be adaptable, but also felt the refuge staff has "moved from one trend to another without good science to support the move." A respondent suggested the refuge always replace a restriction with an opportunity and wrote, "For example: Establishing the Research Natural Area in the heart of the valley and restricting access to it, and in return establishing more trail open to multi-use in other areas of the refuge. I would suggest adding a chapter to the CCP outlining the "exchanges" proposed in this CCP."

Response: As described in chapter 4 of the final CCP, developing refuge goals was one of the first steps in our planning process. Goals are intentionally broad, descriptive statements of the desired future condition for refuge resources. By design, they are less quantitative, and more prescriptive, in defining the targets of our management. They also articulate the principal elements of refuge purposes and our vision statement and provide a foundation for developing specific management objectives and strategies. We feel the goals in the final CCP accomplish this.

We are not required by any regulation or policy to provide a new recreational opportunity whenever we restrict an existing recreational opportunity, and we do not intend to do so in the final CCP.

1.73 Issues and Opportunities

There were no comments in this category.

1.8 Out of Scope

(Letter ID#: 4)

Comment: One respondent wrote about people's rights to have guns.

Response: Comment noted.

1.9 Attachments

Twenty one people attached a document containing their comments to an email sent to the Fish and Wildlife Service. One person attached a map to their email. All attachments were reviewed by the Service and considered in the public comment process.

2.0 Physical Environment

(Letter ID# 162)

Comment: One comment was placed in this category as it was an introduction to their specific comments about the refuge.

Response: No response required.

2.1 Global Climate Change

(Letter ID#: 13, 82, 176)

Comment: Three respondents commented on climate change. One wanted the refuge to ensure continuous forest. Another wrote: “In the climate change section of the “Actions Common to All Alternatives, Chapter 3-14”, it says models show a projected July temperature increase by 50 F. This number seems unrealistic. Is it a typo for 5 degrees F?” Finally, another commenter questioned whether a 5000-6000 acre patch of forest would really affect climate change.

Response: Goal 2 in the final CCP states our objectives and strategies for managing forested habitats. The 50 F is an error. We changed this in the final CCP to 5 F.

The refuge agrees that small forest patches can not affect the overall course of a changing climate. However, as we discuss in Chapter 4 of the final CCP, there are ways the refuge can plan for projected changes in temperature and precipitation patterns to mitigate the possible effects of climate change on refuge lands and between refuge lands and other protected lands adjacent to the refuge. For example, increasing connectivity of forested habitat, such as red spruce forests, within the refuge and between the refuge and other lands can help create corridors for animal movements in the high elevation areas. By creating a healthy and ecologically functional forest (large forest blocks, connectivity, low invasive species presence etc.) the refuge can help create a forest that is more resilient to drought, temperature shifts and other stresses brought on with climate change. As we discuss in Chapter 4, the refuge can only adaptively manage habitats as climates change, and possibly predict stresses before they occur so that actions can be taken to mitigate the impacts.

2.2 Hydrology and Water Quality

There were no comments in this category.

2.3 Soils

(Letter ID#: 162, 195, 208)

Comment: Several people commented that the refuge take care not to disturb soils. One person related soil disturbance to carbon release stating, “Disturbing soils and exposing them to sunlight causes large releases of carbon into the atmosphere and degradation of the soils themselves. Soil disturbance increases erosion from wind and water. It degrades aquatic resources and harms wetlands. Many invasive species follow disturbed areas. Wildlife habitat and the flora are destroyed, as are scenic values. Management activities should always consider using the minimum impact tool rule. That is; what’s the least disturbing method capable of achieving our goals? Carbon accounting should be considered in any activity that reduces forest canopy cover or disturbs soils.”

Response: We agree with this comment. We take soil disturbance and vegetation clearing very seriously, and we always analyze the impacts of these types of actions before implementing them.

2.31 Erosion and Sediment

(Letter ID#: 174)

Comment: One person responded with data demonstrating that bicyclers do not have detrimental effects on soils compared to other user groups.

Response: We appreciate the submittal of this data. However, this information has not changed any of our decisions regarding the use of bicycles on the refuge. For a detailed map showing which trails we allow bicycling on, see Map 4-2.

2.4 Solid and Hazardous Waste Management

There were no comments in this category.

2.5 Air Quality

(Letter ID#: 175, 195)

Comment: One person wrote that the AIRMoN/NADP research component was moved from the Beall site in June 2007. Another person wrote that air quality: “you state air quality is “good.” It is bad; it is the worst in the nation. Your Bearden Station pH is acid, and indicative of sulphuric acid from sulfur in the air that we breathe. You should post warnings about strenuous outdoor exercise as they do in the Smokies and Shenandoah National Parks where they get half the acid rain that you do. You should join them and the “Federal Land Managers (FLM-Air) Group” in studies (using CVI) and join in efforts to clean up our air. The spruce substrate is now acid, nutrient poor - impoverishing its site further until it falls and recycles.”

Response: As stated in an earlier response, only some of the equipment associated with this weather station was moved in 2007. The rest of the equipment remains on the Beall tract.

We acknowledge in several places in the draft CCP/EA and the final CCP that air quality in Canaan Valley is less than desirable. For example, in chapter 3 of the final CCP, under the title “Climate,” we state, “Recent research shows that the valley is impaired by both wet and dry sulfuric and nitric acid precipitation as well as high levels of ozone pollution.” Despite the concerns about air quality in Canaan Valley, neither the refuge nor the Service has the expertise to conclude that warnings should be posted regarding poor air quality.

3.0 Socio Economic Setting

(Letter ID#: 175)

Comment: One person asked the refuge to provide a table of median income: “Table 2.3 on page 2-10, Regional Economic Setting, provides Income, Unemployment and Poverty Estimates for the closest communities to the refuge. For perspective, reference and convenient disclosure of public information, please include in the table the median income (or household income) for refuge employees. Based on calculations from information provided throughout appendix B in the full CCP document, this figure would be a minimum of \$75,400 (with a range of \$37,600 - \$117,000). Also include in the text that refuge employees earn salaries well above (two to three times above) the local, State and national average for median household income. Also add this figure to Table H.3 on page H-4.”

Response: We do not think this information is relevant to this plan and therefore we will not include it in the final CCP. However, appendix H in the draft CCP/EA discusses the total annual staff salaries under each alternative, and how this figure varies among the alternatives depending on different staffing scenarios. In addition, salaries of Federal employees are public knowledge. To calculate salaries, refer to the refuge staffing chart in appendix G and determine the relevant pay levels for the various General Service (GS) and Wage Grade (WG) employees.

3.1 Local Economy

(Letter ID#: 74, 160, 164, 175, 192)

Comment: Several people commented on the refuge’s impact and contribution to the local economy. One person stated, “The refuge has kind of put us in a slump where it could either excel us, make us a better place for business, or it may hurt us and I think we can work with both of them to make both work.” Similarly, another person stated that the refuge has aided in depleting Tucker County tax base. One person felt the refuge staff incomes should be included in the charts on incomes for the area. Another person thought refuge personnel living in Elkins was not beneficial to the local economy writing: “The statement, “The city of Elkins plays a major role in the economic impacts of the refuge because the majority of staff resides there” is misstated.

Response: We understand that many people are concerned with the government buying land because the government does not pay taxes on the land that it owns. However, as we describe in Chapter 3 of the final CCP, the refuge pays annual refuge revenue sharing payments to counties based on the acreage and the appraised value of refuge lands in their jurisdiction. These annual payments are calculated by a formula determined by Congress, which also appropriates funding. We will continue those payments in accordance with the law, commensurate with changes in the appraised market value of refuge lands, or new appropriation levels dictated by Congress.

Federal employee salaries are, indeed, included in Table 3.3, “Income, Employment and Poverty Estimates,” in Chapter 3, “Affected Environment,” in the section entitled “Regional Economic Setting” of the final CCP.

3.2 Property Value

(Letter ID#: 206)

Comment: Another person wanted the draft plan to assess the impact of Option B on property values.

Response: We assume that “Option B” means “Alternative B” from the draft CCP/EA. In any case, we are not assessors and therefore we do not have the expertise to assess property values. Rather, we suggest you talk to your town or county assessor.

3.3 Recreation and Tourism

There were no comments in this category.

4.0 Cultural Resources

(Letter ID#: 60, 196)

Comment: The West Virginia Division of Culture and History complimented the refuge on its willingness to protect or avoid disturbing historic resources and asked that if avoidance is not possible then mitigation efforts must be planned and adhered to. They applauded the refuge developing protocols for prehistoric and historic overview planning documents. One specific comment stated, “Of minor note, page 2-44 states that a project-oriented survey did not discover any sites, but did produce information about grave sites and historic structure foundations. Please know that structure foundations are considered archaeological sites by this office. Finally, we ask to receive copies of the overview studies and the 2007 report documenting the investigation of a subset of the potential historic sites for our records.”

Response: Service archaeologists in the regional office keep an inventory of known sites and structures and ensure that we consider them in planning new ground disturbing or structure altering changes to the refuge. They consult with the West Virginia Division of Culture and History concerning projects which might affect sites and structures, and conduct archaeological or architectural surveys when needed. These activities will ensure we comply with section 106 of the National Historic Preservation Act.

We agree to send copies of the overview studies and the 2007 report.

Comment: The West Virginia Division of Culture and History requested the following changes:

“Architectural Resources:

We request that the following changes be made to the draft management plan. On pages 2-44 and 2-55 of the draft plan, the presence of architectural resources has been included in the general introduction as well as given a cursory mention under archaeological resources. We request that this be separated out and that any known architectural resources be addressed separately. At present, there is no indication if any architectural resources actually exist in the management area. There is only an indication that an archaeologist keeps a list of buildings and construction projects for potential effect to archaeological and architectural resources. On page 3-6, please also note that any evaluation of eligibility and effects on architectural resources must be completed by someone meeting the National Park Service’s qualification standards for Architectural Historian. Please see http://www.nps.gov/history/local-law/arch_stnds_9.htm for further guidance on these standards.”

Response: These changes have been made.

Comment: Another commenter complimented the refuge’s commitment to cultural and historic preservation.

Response: Comment noted.

5.0 Refuge Administration

(Letter ID#: 60, 123, 175, 179)

Comment: A respondent wanted the refuge to continue its Youth Conservation Corp Program. Another wanted the refuge to increase efforts at communication with the local community. One person felt the Northeast Regional Office has mismanaged Canaan NWR.

Response: As stated in the final CCP, we will maintain the Youth Conservation Corp program. We will also increase communication through various forms of media, including local television, the Internet, newspapers, and promotional advertising. The comment about mismanagement has been noted.

5.1 Land Acquisition

(Letter ID#: 43, 52, 60, 97, 98, 128, 129, 130, 132, 136, 142, 164, 175)

Comment: About 15 people commented on land acquisition. One person was concerned that as government agencies purchased more and more land, there would be less and less for individuals and less children in schools thus decreased school funding. Others were also concerned about the reduced tax base as the refuge acquired more land.

Response: As mentioned previously under the section, “3.1 Local Economy,” we understand that many people are concerned with the government buying land because the government does not pay taxes on the land that it owns. However, as we describe in Chapter 3 of the final CCP, the refuge pays annual refuge revenue sharing payments to counties based on the acreage and the appraised value of refuge lands in their jurisdiction. These annual payments are calculated by a formula determined by Congress, which also appropriates funding. We will continue those payments in accordance with the law, commensurate with changes in the appraised market value of refuge lands, or new appropriation levels dictated by Congress.

Comment: One person asked if the land acquisition funding carried over year to year.

Response: Funding for land acquisition at Canaan Valley NWR largely comes from the Land and Water Conservation Fund. While money from this fund can carry over from year to year, the longer it carries over, the greater probability that the money will be taken away from the refuge and used for other purposes.

Comment: Several people wanted the refuge to acquire more land as necessary to preserve natural resources.

Response: Comment noted.

Comment: One person who opposed land acquisition stated, “I strongly oppose any further land acquisition including easements which are being held for the service in Canaan Valley, except for NWI qualifying wetlands, until revenue sharing payments since 1995 are paid in full. It is a shame that the USFWS gets away with not paying its promised commitment to the community, and still actively pursues gaining additional property that will increase the debt the service has not been able to alleviate. Any funding secured for land acquisition for CVNWR should be designated to bringing the revenue sharing payments to a “paid in full” status. I know this is a repeat of an earlier comment but there are a lot of folks in the community who feel the same way.”

Response: We explained in appendix H of the draft CCP/EA that, under provisions of the Refuge Revenue Sharing (RRS) Act, local counties receive an annual payment for lands that have been purchased by full fee simple acquisition by the Service. Payments are based on the greater of 75 cents per acre or 75 percent of the fair market value of lands acquired by the Service. We reappraise refuge lands at least once every 5

years to ensure that those payments are based on market value. The exact amount of the annual payment depends on Congressional appropriations, which in recent years have tended to be less than the amount to fully fund the authorized level of payments. In fiscal year 2005 (FY05), actual RRS payments were 41 percent of authorized levels. This was the lowest percent Congress has funded since 1977. The 31-year average of revenue sharing payments is 68.08 percent, and the average payment for the last 10 years is 51.88 percent.

The refuge does not have the authority to increase appropriations for Refuge Revenue Sharing. Only Congress has that authority. However, the actual economic impact of refuge land acquisition is more complex than Refuge Revenue Sharing. For example, when we retain land as habitat, it reduces the need for the services each town provides and increases the revenue to local businesses from visitor, staff and refuge purchases. Those effects further mitigate the economic impacts on each town. We also believe that the towns around the refuge will continue to develop, further increasing their tax base.

5.2 Staffing and Budgets

(Letter ID#: 54, 58, 70, 71, 72, 80, 84, 89, 97, 98, 101, 136, 143, 170, 175, 202, 207)

Comment: Twenty people commented on refuge staffing and budget. Several individuals wanted to see additional staff added to the refuge such as a park ranger and biological technician. Several people also wanted to see a permanent Administrative Assistant at refuge headquarters.

Response: As stated in the final CCP, we will convert two temporary positions to permanent positions, and we will add four new staff members, including a park ranger and a biological technician.

Comment: One person wanted to see the visitor center open seven days a week year round and another wanted to accelerate the time table for staffing the visitor center to be within one year.

Response: As stated in the final CCP, we will open the Visitor Center seven days per week during times of peak visitation and at least three days a week during the rest of the year. The time table for staffing the visitor center will depend on when we are able to hire more staff.

Comment: Several people expressed their displeasure with staff personnel residing in Elkins. One person was stated, "I am very, very unhappy to hear all these people that work for the Wildlife Refuge in Canaan Valley comment and say that this area is not conducive for our wives, our kids. I raised five children here and this is very, very upsetting. We have anything that you want to do and the Wildlife Refuge provides that...hiking, biking, you know, skiing. There is everything here plus, you know, walking. There is a good school. We may not have a mall on the corner but certainly it would be much easier to drive to Elkins once a week and shop at a mall than it would be to drive back and forth every day and we have a very good school system here. And I would think that maybe these wives need to visit the valley more themselves and not just let their husbands come up here"

Response: Where members of the refuge staff choose to reside is a personal choice and this choice does not in any way reflect on the staff's dedication to Canaan Valley or to the refuge.

Comment: One person wanted to know if the current refuge budget was outlined in an appendix in the CCP. Several people wanted to know how the refuge planned to operate based on budget changes from year to year and others wanted to know how the budget was affected by alternative.

Response: Refuge staffing and budget figures from 2002-2008 are shown in chapter 3 of the final CCP. Refuge budgets change from year-to-year depending on fixed and one-time costs. The refuge responds to budget changes by prioritizing its management activities. Top management priorities are addressed first, and if funding allows, the refuge will address less urgent priorities. Appendix F in the draft CCP/EA offers a side-by-side comparison of the budget needs by alternative.

Comment: A commenter suggested that operational funding should be directed towards wildlife preservation and not towards education.

Response: The National Wildlife Refuge System Improvement Act defines wildlife observation, photography, environmental education, and interpretation as priority public uses that, if compatible, are to receive our enhanced consideration over other general public uses. Authorizing these uses provides opportunities for the public to enjoy wildlife and plants on the refuge in accordance with law, and it produces better-informed public advocates for Service programs.

The funding of habitat management and environmental education are not mutually exclusive. Therefore, we will continue to fund both at appropriate levels.

Comment: Voicing opposition to additional staffing a commenter wrote, “As a retired administrator of a natural resource agency where I supervised the operations of several similar areas and a former seasonal for your sister agency - the US Forest Service, I feel that I am somewhat qualified to assess the number of personnel. Due to the small amount of acreage, 17,000 now and at the most in the future, 24,000, and at least 4 months of low visitation and opportunities to do field work because of inclement weather, I can see no justification for additional staffing above the present level with the exception of a few seasonals.”

Response: We present a staff of 12.5 in the final CCP. As stated in Chapter 4, this staffing level is the recommended number of positions in the 2008 staffing model. Staffing models were developed to answer the following basic question: “What level of staffing is needed to operate and manage a station to achieve the station’s purpose, contribute to the mission and goals of the Refuge System, and comply with the Refuge Improvement Act and other laws, regulations, and policy?” Although these models solicited input from the refuge, they were ultimately developed for all refuges nationwide by our Washington office using objective frameworks. Therefore, this is the staffing model the refuge will continue to use.

5.3 Partnerships

(Letter ID#: 57, 87, 95, 97, 143, 162, 163, 174, 175, 177, 178, 187, 191, 208, 209)

Comment: Most of the comments encouraged the refuge to continue to foster partnerships with the local community, local businesses, other private organizations and other agencies. Several respondents offered assistance with trail construction and road maintenance.

Response: We appreciate this encouragement and offer of support.

Comment: One person wanted clarification concerning the refuge’s working with private landowners to coordinate mowing.

Response: This comment is related to a proposed strategy in the draft CCP/EA which states that the refuge will work with private landowners and partners to encourage late haying and mowing of privately owned grasslands adjacent to refuge property. Refuge grasslands are integrally linked to surrounding private grassland habitat, and the ultimate success of grassland bird populations in the valley depends on all grasslands in the valley, not just refuge managed grasslands. Grasslands on the refuge are mowed later in the summer (late July) to help ensure that grassland birds will have an opportunity to raise one clutch of young before mowing occurs. By encouraging private landowners to similarly manage their grasslands, we can work together to help protect important fledging habitat for many of the valley’s grassland birds.

5.4 Interagency Coordination

(Letter ID #: 189, 195)

Comment: One person asked the refuge to work with Canaan Valley State Park on a trail from the refuge center to connect with CVSP trails. Another person asked the refuge to work with parks to control the deer population.

Response: As stated in the final CCP, under objective 4.3, we will initiate discussions with the State's Parks and Recreation branch about the possibility of a trail connecting the refuge's Visitor Center to Canaan Valley State Park.

The Wildlife Resources Section of the West Virginia Division of Natural Resources manages deer (and other game) populations on properties throughout the State, including properties owned and managed by the State's Parks and Recreation Section. Although the refuge does not have the jurisdiction to control the deer population on State park lands, we are always willing to engage in broader discussions related to deer population control in Canaan Valley.

5.5 Revenue Sharing Payments

(Letter ID#: 13, 59, 60, 96, 128, 129, 165, 175)

Comment: Most of the commenters wanted the refuge to pay their taxes and pay in full their revenue sharing payments. One person wanted to know what percent of PLT is being paid now.

Another person wanted to know if there would be differing revenue based on the plan, stating, "I was wondering about the plan is kind of divided into more public use of the refuge and some of them are more protected lands of the refuge vs opening it up to other types of uses, off trail uses and things like that. Would that make a difference in revenue..."

Response: As an agency of the United States Government, the Service, is exempt from taxation. However, as stated above in our fourth response under "5.1 Land Acquisition", the Refuge Revenue Sharing Act states that local counties receive an annual payment for lands that have been purchased by full fee simple acquisition by the Service. The exact amount of the annual payment depends on Congressional appropriations, which in recent years have tended to be less than the amount to fully fund the authorized level of payments. In fiscal year 2005 (FY05), actual RRS payments were 41 percent of authorized levels, and they remained at this level through Fiscal Year 2007. This was the lowest percent Congress has funded since 1977. Figures for percentages beyond Fiscal Year 2007 were unavailable. The 31-year average of revenue sharing payments is 68.08 percent, and the average payment for the last 10 years is 51.88 percent. The refuge does not have the authority to increase appropriations for Refuge Revenue Sharing. Only Congress has that authority.

The final CCP will not affect Refuge Revenue Sharing payments.

5.6 Special Use Permits

(Letter ID#: 42, 53, 60, 90, 95, 97, 113, 114, 175, 187)

Comment: Several people questioned the feasibility of issuing more special use permits concerning the increased burden on staff and budget. Several people wanted to streamline the hunting permit system. One person wanted it to be on a lottery system.

Response: The final CCP does not significantly increase the amount of special use permits that will be issued by the refuge. A few new public uses such as rabbit hunting and parking overnight at Forest Road 80 will require a special use permit. However, we do not expect an overwhelming number of people to be requesting these special use permits and therefore we do not believe this will significantly increase the burden on the refuge.

Regarding a more streamlined system for hunting, we state in the final CCP under objective 4.1 that we will work towards implementing a simpler, streamlined permitting system for the refuge's hunting program.

Regarding lottery systems, these systems are typically used only when a refuge cannot accommodate the number of hunters who want to hunt on the refuge. Since this refuge can currently accommodate all hunters, there is no need to institute a lottery system at this time.

Comment: One person did not understand the need to obtain a special permit for rabbit hunting.

Response: In the final CCP we require that hunters obtain a special use permit for rabbit hunting. This special use permit will require that rabbit hunters turn in rabbit skulls to aid in the identification of eastern and Appalachian cottontails harvested on refuge lands.

Comment: Another person felt that whenever the refuge office is open, that permits should be available.

Response: The refuge makes every effort to make hunt permits available to the public. Hunt permits are issued automatically and sent out via mail when a hunter turns in his/her survey from the previous year. Permits are also available by calling the refuge office or via an email request system. Hunt permits are issued in person when refuge staff is available, but occasional staff meetings and other commitments may interfere with the availability of refuge staff.

Comment: Concerning overnight parking a respondent commented, "Allow overnight parking by permit on Forest Road 80 for visitors accessing and camping in Dolly Sods."

Response: The final CCP states that the refuge will allow overnight parking by permit on Forest Road 80 for visitors accessing and camping in Dolly Sods. Camping on the road or anywhere on the refuge is prohibited.

Comment: A respondent wanted the winter access bid process to be fine tuned and clarified. On a similar note, a respondent wanted the refuge to continue the White Grass ski touring permit agreement.

One respondent asked, "Talking about...it says under Alternative B, consider converting the special use permit for commercial cross country skiing and snowshoeing to a concession. What does that mean?"

Response: White Grass Ski Touring Center (White Grass) operates about 10 miles of its commercial cross-country skiing and snowshoeing operation on the southern end of the refuge. Prior to the CCP, this use has occurred pursuant to an annual special use permit issued by the refuge to White Grass under specific conditions. In the final CCP, we state that we will use a different and more updated process for permitting White Grass to operate some of its cross-country skiing and snowshoeing trails on refuge lands. Within five years of CCP approval, we will convert this special use permit to a concession contract, pursuant to Director's Order 139 and 50 C.F.R. 25.61. This Director's Order states that project leaders may use concession contracts to provide wildlife-dependent and other activities detailed in the National Wildlife Refuge System Improvement Act of 1997. This new process will require the refuge to prepare a prospectus and notify the public of available opportunities to operate a commercial concession on Federal land. Existing and previous concessionaires and any other interested parties will receive a copy of the public notice, making this a competitive process. We will conduct additional NEPA analysis if required.

5.7 Safety and Law Enforcement

(Letter ID#: 6, 52, 132, 172, 175)

Comment: A commenter was concerned with all the hunters and fishermen who access the refuge via private property. Several people were concerned with safety and enforcement if the refuge placed a hiking trail near private property.

Response: Hunters and anglers are only permitted to access the refuge via private property with the landowner's permission. It is not within the refuge's jurisdiction to control which private property owners permit access to hunters and anglers.

Concerns about safety and enforcement will be addressed when we conduct additional NEPA analysis on newly proposed trails.

Comment: Several other people wanted the refuge to hire a full time law enforcement person.

Response: The refuge currently has a full-time law enforcement officer.

Comment: One person had a specific comment concerning unexploded ordnance on refuge grounds: “Page 2-5, Physical Environment, Unexploded Ordnance: This sections states that the presence of unexploded ordnances was thought limited to the area east of the Refuge in the Dolly Sods Wilderness area until a live artillery round was found on the refuge in the spring of 2007. Canaan Valley Institute property is adjacent to and lies to the north and west of refuge property. Five unexploded ordnances have been found there, beginning as early as 2005. At that time, the refuge should have realized that the refuge property was likely to hold unexploded ordnances.”

Response: The refuge is aware of the confirmed cases of unexploded ordnance on lands adjacent to the refuge. Therefore, we have modified the wording of this section, located in Chapter 3 of the final CCP, to read, “The presence of unexploded ordnance - left over from military training activities during World War II - on refuge property was thought possible due to the confirmed presence of ordnance in both the Dolly Sods Wilderness area to the east of the refuge and the Canaan Valley Institute property to the west of the refuge. This possibility was confirmed when a live 105mm artillery round was found by a hunter on refuge property during the spring of 2007.”

5.8 Infrastructure

(Letter ID#: 13, 54, 57, 60, 91, 146, 156, 157, 163, 165, 175, 176, 189, 195, 202, 207)

Comment: About 27 people commented on infrastructure on the refuge. One person wanted to know what would happen to buildings utilized by White Grass if that business changed ownership.

Response: White Grass ski center operates out of a private building located on private property. The refuge has no control over what happens to this building regardless of who owns the business.

Comment: Several people felt a visitor center was a great idea, but one commenter wanted documentation concerning the need for a 100 person meeting room.

Response: The meeting room would be use for internal meetings as well as for public events. Records show that many of the refuge’s public events attract up to 100 people. Therefore, we proposed to build a room that would accommodate up to 100 people.

Comment: Most of the comments wanted the rebuilding of the swinging bridge.

Response: The refuge is currently working on the contracting and environmental compliance for this bridge and construction will start as soon as possible.

Comment: One person wanted clarification concerning building an ADA-compliant fishing platform on Camp 70 stating one already exists. A different person was in favor of an additional ADA fishing platform on the Camp 70 road. In opposition, another person stated, “I am not in favor of another ADA-compliant fishing pier along Camp 70 Road unless and until the one that CVI has already established is documented to be not meeting the demand.” Similarly, a respondent wanted the refuge to place an ADA fishing platform at a location where there was year round water: “What would be the point for the refuge to cooperate with Canaan Valley Institute (CVI) to build an ADA fishing pier in the Camp 70 area of the Delta 13 Road? Very few people go past the CVI property line to fish because the WVDNR does not stock trout past this point, and they won’t because it’s too far to carry the fish. CVI has an ADA fishing pier on

its property along the Camp 70 Road (Delta 13), the first one in the county, built in 2005. This plan should address the relocation of the ADA fishing pier, constructed last year on refuge property on the Blackwater River on the Timberline Road, to an area that has water enough to fish year round.”

Response: As mentioned earlier, under our second response in the above section entitled, “1.2, Document (Clarity, Technical, Editorial, Availability)”, we have decided to remove the strategy from the draft CCP/EA, Alternative B, that reads, “Work with Canaan Valley Institute (CVI) to construct an ADA-compliant fishing platform on Camp 70 Road, on the Service’s property or on CVI’s property.” Since the refuge now has an ADA-compliant fishing platform on Timberline Road, and CVI has an ADA-compliant fishing platform on Camp 70 Road, we have decided not to proceed with a third ADA-compliant fishing platform on the refuge at this time. Regarding the fishing pier on Timberline Road, there are currently no plans to relocate this structure to a location where there is enough water year-round to fish.

Comment: There was a comment to build a pedestrian bridge on Blackwater River stating, “Build the bridge to replace the Swinging Bridge providing access to trails, both Refuge and CVI, on the south side of the Blackwater River.” The same person asked if there was already a trailer pad on the refuge.

Response: Current plans for a new pedestrian bridge across the Blackwater River will provide access to both refuge and CVI trails.

There currently is a trailer pad on the refuge.

Comment: One person wanted to see all power lines buried and the refuge go to solar power.

Response: Within the last two years, the refuge has purchased two small solar panels for use in construction projects. The refuge fully believes in the importance of greening our infrastructure and will continue to pursue those opportunities on a larger scale in the future.

Comment: Finally, a commenter wanted to see an environmental education pavilion on Beall Tract and not on Freeland Tract.

Response: The final CCP states, in goal 4, objective 4.4, that we will construct an environmental education pavilion on the Beall Tract.

5.9 Education and Recreational Opportunities

(Letter ID#: 2, 57, 59, 60, 63, 85, 95, 97, 140, 162, 165, 168, 175, 181, 187, 189, 195, 205, 207, 208)

Comment: About 25 comments fell in this category. Most people were in favor of increased educational opportunities and encouraged the refuge to expand its efforts to educate the general public and local school children. Some suggested kiosks, visitor center, interpretive signage, and special events. Other specific suggestions included more education on cultural history, an education pavilion on Freeland Tract, teaching the scientific method, refuge tours led by refuge staff and open house meetings.

Response: We appreciate the support for increasing environmental educational opportunities on refuges. For a full explanation of how the refuge plans to increase these opportunities over the next 15 years, see objective 4.4 in the final CCP.

Comment: One person said that education could be best handled through increased partnerships instead of increased refuge staff and funding.

Response: We believe that quality environmental education programs can be delivered by the refuge *and* by our partners, and that the two are not mutually exclusive of each other.

Comment: A respondent asked the refuge to inform the public of invasive species and utilize a spruce restoration site for education and outreach. Another person asked the refuge to educate the public on the value of predators.

Response: We agree it is important to educate the public on the dangers associated with invasive species and on the important role that predators play in our fragile ecosystems. We will consider the idea of utilizing a spruce restoration site for education and outreach, but we do not plan to include that action item in the final CCP at this time.

Comment: One respondent questioned the value of a traveling educational program and felt the money would be better spent on the refuge itself.

Response: Comment noted.

6.0 Biological Resources

6.1 Vegetation and Habitat Resources

(Letter ID #: 162, 163, 172, 174, 175, 178, 195, 197, 2, 208, 95)

Comment: Two respondents suggested the refuge use minimum management techniques and use the minimum tool rule.

Response: The refuge appreciates the suggestion for the use of “minimum tool” techniques for management actions. When making decisions on habitat management, methods are evaluated for their efficiency and effectiveness. The refuge system is not held to the “minimum tool” standard like USFS Wilderness policy. However, decisions are made to reduce the impact of habitat management when possible.

Comment: Use of controlled burning was applauded by one respondent.

Response: Comment noted.

Comment: Most of the respondents in this category wanted the refuge to provide secure protection of the natural resources.

Response: Comment noted.

Comment: One person stated there is no scientific research to indicate that bicycles cause environmental degradation.

Response: The refuge acknowledges the research on this subject and has approved bicycling riding on designated roads and trails. Impacts to soils and vegetation are just one component of evaluating uses which are proposed on National Wildlife Refuges. Other issues used to evaluate which uses are compatible include disturbance effects, transportation of invasive species and safety. We review all impacts of bicycle uses in appendix B of the final CCP (Finding of Appropriateness and Compatibility Determination – Bicycling to Facilitate Priority Public Uses). We evaluated impacts of public use more generally in Chapter 4 (Effects of Public Use and Access) of the draft CCP/EA. The final CCP designates 25.5 miles of trail open to bicycle use. This is an increase from current management.

Comment: A person suggested that planting of native trees should rely on grant funding, partnerships and volunteer support.

Response: The refuge has developed very productive relationships with diverse partners through the Central Appalachian Spruce Restoration Initiative which has allowed for sufficient funds to conduct spruce and fir planting activities. However, the refuge will supplement funds as necessary and when available to conduct this management action.

Comment: Concerning past fires, another person stated, “Surely Zurbuch mentioned logging. The significance of those fires is that they burned every bit of organic soil that was not wet.”

Response: Comment noted.

Comment: Several people wanted the refuge to ensure that it works with private landowners and other partners in implementing their vegetation management plans.

Response: The refuge has and will continue to work with willing landowners and partners to help implement habitat management actions.

Comment: It was suggested that the Canaan Valley was originally heavily forested and the refuge should manage its lands for natural succession. Along similar reasoning, a respondent stated, “Sum-27: Alt A, “Continue to allow the dynamic nature of beaver pond formation and evolution where bottomland forested and rare plant communities are not threatened.” Should delete “bottomland forested and”. Flooded timber (dead, alive, or both) provides valuable ecological communities and diversity.”

Response: In the preferred alternative of the draft CCP/EA the refuge identifies many areas where natural succession will be allowed to occur. Examples include wetland habitat in Objectives 1.1, 1.2 and 1.5 and upland habitat in Objective 3.3. The refuge acknowledges the value in flooded forested habitat; however prolonged inundation can threaten the acreage and persistence of rare forest communities such as wetland balsam fir and red spruce. These communities are rare in the State and have declined in Canaan Valley partly due to beaver flooding. The refuge is committed to protecting rare plant communities in balance with permitting natural beaver activities to occur. See Objective 1.2 in the final CCP for more information on this management direction.

Comment: Finally, concerning vegetation management, a commenter wrote, “Though this general objective is worthy, the CCP should strive for specific goals (i.e. 10 percent of Refuge in 0-15 year age class, 10 percent 16-30 year age class, etc.).”

Response: Specific details of age class diversity and species composition as well as specific methods and locations with the forest where this management will occur will be written into the refuge’s Habitat Management Plan. This is a step down plan to the final CCP. Please see further explanation in the Final CCP in Chapter 1, Refuge Operational Plans (“Step-Down Plans).

6.2 Freshwater Wetland Habitat

(Letter ID #: 101, 13, 143, 168, 175, 178, 195, 197, 209, 54, 98)

Comment: A commenter complimented the refuge wetland goals writing, “The proposed strategies to restore the hydrologic connectivity of wetlands are excellent, as are the strategies to restore cold water fisheries and the red spruce ecosystem through tree planting, especially where the red spruce seed source is no longer available. Single tree fall also adds structural complexity, increasing the habitat niches important: In order to develop site-specific restoration plans and ecological integrity metrics, wetland habitat mapping for the Refuge should first be completed. The National Vegetation Classification units were finalized for all of the vegetation types on the Refuge in 2009. Mapping to this FGDC standard is an achievable and worthwhile goal. Based on my experience with vegetation mapping, this could probably be accomplished in a concerted six-month effort with trained personnel and the GIS resources of the refuge. Stand quality and restoration needs should be an integral part of vegetation mapping. Species of concern that benefit from forested wetlands include a long list of rare plants in addition to the one species (balsam fir) mentioned here. A few highlights are black ash (*Fraxinus nigra*), alder-leaf buckthorn (*Rhamnus alnifolia*), Canada yew (*Taxus canadensis*), cranberrytree (*Viburnum opulus* var. *americanum*), glade spurge (*Euphorbia purpurea*), Jacob’s ladder (*Polemonium vanbruntiae*), purple avens (*Geum rivale*), brome-like sedge (*Carex bromoides*), and dwarf red raspberry (*Rubus pubescens* var. *pubescens*).”

Response: The comment on wetland goals and upland forest structure strategies is appreciated. The refuge is interested in developing a new vegetation map utilizing the NVCS and will work towards revision of our existing map as funding permits. The refuge realizes the importance of forested wetlands and has developed an objective specifically for managing and conserving these resources. Please see Objective 1.2 of the final CCP for more information.

Comment: One person wanted the refuge to work with the State and other partners to stock only native freshwater species.

Response: The refuge is interested in working with partners to improve native freshwater species habitat and presence. Please refer to Objective 1.4 of the final CCP for more information on this topic.

Comment: Concerning channelization, a respondent specifically stated, “Regarding Freshwater Wetland Habitat: I do not see how the referenced Map 2.1 in any way indicates or corresponds to “Some of the tracks or pathways have become channelized and act as barriers to surface water flow.” Please clarify this and specify which tracks and pathways are being discussed.” Another respondent wanted a clear map showing stream channels.

Response: The map used in the CCP for all alternatives is a general overview map and not meant to show detail for channelization impacts or specific stream channels locations. In general, the multitude of old logging roads, ATV trails and railgrades on the refuge often either intercept and divert water flows or impound water preventing continuity in hydrology. Most of these occurrences are on the refuge’s Main Tract although not exclusively. Locations of stream channels on the refuge can be obtained from either the refuge office or the West Virginia Division of Natural Resources. This information can also be viewed through internet mapping programs such as Google Earth.

Comment: Several people responded by desiring the refuge to repair and restore stream banks and several also wanted to see stream banks reforested.

Response: These actions are discussed as strategies to fulfill Objective 1.4 in the final CCP.

Comment: Another respondent was specifically concerned with water chemistry and wrote, “Timberline withdrawals will only take place in winter and summer. Lower flows will not be affected. Blackwater chemistry is moderately rich and then buffered from acid. The tributaries above Greenbrier Limestone Springs and the limestone derived valley floor. You need a geology map. It explains water chemistry and that explains fish population composition and productivity. Pottsville watersheds have no fish (too pure, nutrient poor) to support trout. An example is Yellow Creek and Devils Run.”

Response: The refuge will work with State, Federal and non-profit partners to evaluate water chemistry and its implications on supporting brook trout populations if we attempt any population restoration actions.

Comment: One person challenged the refuge’s appraisal of the wetland history of the Canaan Valley. Their comment can be summarized with a quoted portion from their letter: “Anyone living here long enough can attest to the fact that all of these areas were once easily passable and often completely dry mid-summer. Only in the last 10-15 years, have beaver settled into these areas and covered sections of these grades with ponds.

Response: We agree that beaver have a dynamic influence on the nature and distribution of pond habitat on refuge lands. Beaver are a natural part of the wetland ecosystem in West Virginia and Canaan Valley and have both positive and negative influences on plant communities and other habitats. The refuge will continue to support the dynamic nature of beaver populations over time as described in Objective 1.1, 1.2 and 1.4 in the final CCP. The purposes of the refuge include the protection of wetland resources as well as to ensure the biological integrity of these systems. Allowing areas to revert to wetland habitat from previously altered conditions is one way to help achieve a more natural wetland system on refuge lands.

Comment: While I support the preservation of the Canaan Valley wetlands, appreciate their significance as an unparalleled natural resources in the country, and understand their role in wildlife preservation, I feel that it is disingenuous to claim that these wetlands are more natural than the railroad grades and beaver that set the stage for their development.

Response: The refuge was established in part to protect the wetlands which exist in Canaan Valley. As such the entire suite of wetland habitat types are important for the refuge to protect. Railroad

development is not a natural process and has created obvious changes in the extent, location and functioning of wetlands on the refuge. As directed by the Services Biological Integrity Policy (601 FW 3), the refuge manages habitats when possible to improve the biological integrity, diversity and environmental health of the system. As interpreted in the policy this includes restoring ecosystem function using historic conditions as a baseline (601 FW3 3.10(A)(3)). Therefore artificial structures such as railgrades are evaluated for their effect on the biological integrity, diversity and environmental health on refuge habitats and wildlife. When possible, practical and biologically beneficial these structures will be removed or modified to meet policy goals as described above.

Beaver are a native mammal and the refuge supports their continued dynamic wetland influence with some limitations as described under Objective 1.2 of the final CCP. Namely, when beaver flooding threatens rare forested wetlands, other rare plant communities or significant refuge, State or private infrastructure they will be trapped to prevent or reduce impacts.

Comment: It is a mockery to those who have studied the area formally and informally to include such statements in this comprehensive plan. These statements essentially rewrite the history of these wetlands in order to justify actions that involve spending tons of money, resources, and labor hours to prohibit access and obliterate the most feasible, economic, sustainable, low-impact solution to increasing public use and trail connectivity.

Response: The refuge's first priority is to protect and manage the wetland and upland habitats and their associated wildlife as consistent with the purposes of the refuge and the mission of the Refuge System. The policies which help guide refuge resource management are described in Chapter 1 of the final CCP. The refuge permits recreational uses only after those uses have passed appropriateness and compatibility findings. A listing of appropriateness and compatibility findings for all uses permitted on the refuge are found in appendix B of the final CCP. Locations of public use trails are developed systematically to meet the goals of the public use program, provide adequate access to a variety of refuge habitats and minimize disturbance and other associated impacts. Please refer to Objective 4.3 of the final CCP for more information.

Comment: The irony of stating that remediation of such grades and trails that "have altered the natural hydrologic processes" will allow "natural processes to be restored and soil erosion reduced" is off the charts ridiculous! My problem is not with the Refuge managing the Valley's resources to encourage healthy, viable wetlands and wildlife habitats. My problem is with the mythic account of local history used in the service of some objectives over others. Public access and more varied uses of the Refuge on many of these grades is being denied under the false premise that these grades and public use of them compromises the integrity of the Valley's "natural hydrological process," (read: beaver ponds on old railroad grades). Until the Refuge shut off access to the crossing at the bottom of A-Frame (and many grades and trails), beaver built wetlands elsewhere and I was able to cross without damage to the stream or wildlife habitat."

Response: The refuge's primary responsibility is to ensure resources the refuge was established to protect are not impacted through previous or future influences which would affect the biological integrity, diversity or health of those wetland systems. Some historic railgrades are currently being used as public use trails however others show obvious changes in plant communities likely related to altered hydrologic flows. Trail evaluations are based on a number of factors which are described in the compatibility determinations for public use in appendix B. A discussion of why the refuge did not consider one railgrade as potential access for public use (Jack-Neal's Ford) is found at the end of Chapter 2 under "Issues Considered but not Further Analyzed" in the final CCP. Ultimately, the proper placement of trails to provide for secondary uses of the refuge system (wildlife observation, education, interpretation, photography, hunting and fishing) must be viewed first and foremost through the lens of wildlife and habitat protection and restoration.

Comment: Several people expressed their desire to see the refuge protect wetlands.

Response: Thank you for your comment.

6.3 Red Spruce, Balsam Fir Restoration

(Letter ID #: 13, 60, 101, 141, 142, 143, 162, 178, 202, 205, 208)

Comment: Most of the 11 comments were in favor of spruce/fir restoration. A representative quote states, “There are plenty of reasons to restore spruce forests on the Refuge and just as importantly, there are plenty of reasons to have the Refuge staff working to do so. By any account the Refuge lands were once primarily red spruce forests. Restoring them should be a principal goal for much of these lands, as included in Alternative 2.

Response: Thank you for your comment. Please refer to Objectives 1.2, 2.4 and 2.5 in the final CCP for strategies related to restoring red spruce forests. These objectives identify the need to increase the spruce component of the refuge in both upland and wetland habitats.

Comment: It has been the leadership demonstrated by the Refuge staff that has led to the creation of CASRI. The refuge’s lands are a critical component of the historical high elevation red spruce forests CASRI is working to restore. The staff’s expertise and experience in these restoration efforts have been key to the establishment of this regional effort that is focusing on a landscape scale restoration effort. CASRI is the most exciting, innovative and collaborative conservation effort going on in West Virginia today. Canaan Valley National Wildlife Refuge should continue and expand on its work to restore the red spruce ecosystem on the refuge and continue to provide leadership in its restoration across the mid-Appalachian Highlands.”

Response: The refuge will continue working with CASRI as described in the final CCP and specifically to address Objectives 1.2, 2.4 and 2.5 to increase the quality and quantity of red spruce forest on the refuge.

Comment: However, several people expressed their negative opinion about spruce/fir restoration that can be summarized in the following quote: “I wonder if red spruce regeneration should even be considered on the refuge. From my over 25 years of being in the woods and wetlands of Canaan Valley I have found that the areas where red spruce were, and want to be in the future, have a high number of seedlings naturally occurring at this time. If this program continues, it should be done completely by volunteers, at the volunteer’s expense. CVNWR should commit nothing but permission to use a location for the planting. I believe this red spruce planting program is just another band wagon that the refuge biologists have jumped on by personal preference and the cajoling of like-minded people in the WVDNR, TNC and WVU. Mother Nature knows where red spruce should be in the valley and she’ll put them there.”

Response: The refuge’s red spruce restoration program is aimed at accelerating the growth and distribution of this conifer species. While it is true that some areas are re-seeding naturally, most locations where spruce occurred historically are devoid of seed sources necessary to create desired habitat conditions. Through careful planning and consultation with partners, locations of plantings are based on site suitability, wildlife habitat needs and other factors. To date this work has been accomplished almost entirely through the support of volunteers. However, because this habitat type is rare in the State, important for a host of wildlife species in need of conservation and is a historical community type, the refuge will also use station funds, when necessary and available, to further this restoration effort. As always, the refuge will use adaptive management and the best available information to make decisions on locations of future planting efforts.

6.4 Upland Habitat

No comments were placed in this category. There were comments that mentioned upland habitat, but their comments were really about early successional forests.

6.5 Forest Fragmentation

(Letter ID#: 2, 53, 54, 139, 141, 162, 163, 176, 180, 208)

Comment: Opinions were nearly evenly divided concerning forest fragmentation. Four people questioned the validity that logging roads created fragmentation and retorted that the roads were actually valuable

ecosystem variants; several other people agreed on the need to reduce forest fragmentation; and couple people were not in favor of cutting patches along the toe slopes.

Response: Logging roads create linear canopy and understory gaps in otherwise contiguous forested habitat. As discussed in Objective 2.1 in the final CCP these corridors may affect forest interior bird habitat, amphibian distribution, predator levels and non- native plant presence and abundance. The refuge is also concerned with the effect logging and skid roads have on local hydrology. Because these roads often bisect streams and spring flows, the flows are often diverted away from natural channels through intentional ditching or subsequent erosion. Removing and recontouring old logging and skid roads will help restore the original hydrology of the refuges forested landscape and improve the biological integrity, diversity and environmental health of refuge land (see 601 FW3 for more information on this policy).

In regards to forest cutting along the toe slopes, these areas will not serve as fragmentation of existing forested habitat as they are entirely on the edges of forest blocks and are mostly buffered by shrub communities. The refuge is managing for large forest block size to protect and improve habitat for forest interior birds as described in Objective 2.1. Forest edge cutting will reduce the overall amount of mature forest on the refuge but not significantly affect the habitat values for forest interior species or create forest habitat fragmentation.

6.6 Early Successional Forests

(Letter ID#: 2, 13, 21, 34, 38, 53, 54, 63, 82, 95, 101, 102, 139, 141, 143, 163, 175, 178, 205)

Comment: About 25 people responded to this category. Most of those respondents were in favor of establishing early successional forests. Some were concerned that too few acres were devoted to this management objective summarized in the following quote: “While we applaud the cutting strategies identified in Objective 3.2, the target acreage of 10-15 acres cut annually is woefully inadequate. If early successional management is to receive the emphasis and priority that is envisioned, larger portions of the 1,130 acres available must be treated. Given that the best early successional stage habitat occurs from years 2 through 15 (provided the deer don’t delay regeneration), 75.3 acres of this habitat should be cut per year in blocks 5-20 acres in size. Well designed and supervised commercial logging could pay for this management action. Objective 3.3 for alternative B has generated similar concern. While we believe that the acreages proposed for management are significant, the treatment acreage and emphasis is not. The first strategy within this object is to develop and implement a shrub and old field habitat management plan. Our concern is that drier alder sites are to be located in years 5-10, much later than plan generation (within 3 years of CCP approval). In order for these sites to receive the emphasis and priority they deserve, they must be located during plan preparation. Given that these will be upland, mineral soil sites, they should respond similarly to their northern counterparts and “experimental” cuts will likely be unnecessary as its effectiveness has been proven. Within this objective, only 5-10 acres per year of active management is proposed for spirea and St. Johnswort communities while at least 100 acres of grassland will be mowed or similarly treated. Given that there are 3,551 acres within the Shrubland and Old Field objective and likely at least 300 acres of spirea and St. Johnswort available, we request that at least 100 acres of this shrubland type be treated annually if the early successional stage emphasis is to be achieved with any measurable success.”

Response: The refuge will remove the annual target acres cut to prevent upper limitations of successional management as described in Objective 3.2 of the final CCP. Limitations presented reflected considerations for available personnel to conduct activities during the appropriate seasons as well as seasonal access restrictions. However, given previous conversations with WVDNR and other partners, we believe that opportunities exist to help achieve management of this habitat over the life of the CCP. As such the refuge will not state maximum annual acres which would limit cuts in the CCP to take advantage of partners support when necessary and available. Commercial logging was considered but not included in part due to the concern of providing deer easier access to regenerating seedlings if logs were removed from the site. We believe the success of successional forest management relies partly on effective deer management to permit the diversity of tree species to regenerate successfully. The size and method of forest edge cuts will be evaluated for successful forest regeneration over time as stated in the CCP. If one method used does not promote successful regeneration the refuge will look for other alternatives to achieve habitat Objectives. The breadth of early successional habitat on the refuge, upland and wetland shrub communities, old field succession, hawthorn savannah and grasslands are also priorities for management

to promote habitat for species of concern. Young dense hardwood forest is a component that is lacking in the valley which is a reason it is detailed in Objective 3.2. Nonetheless it is one component of a larger view of successional habitats which support migratory species of concern on the refuge.

In regards to the acres identified in the shrubland management strategy, we have modified that strategy in the final CCP to state that the refuge will treat that habitat in mosaics of 5-10 acre blocks to make it clear that we are not limiting management to 10 acres or less in any given year. In regards to grasslands being promoted to shrub successional habitat, our intent will be to manage these areas as successional/shrub communities for our priority early successional focal species.

Comment: One person wanted to see mention of active management of riparian areas with early successional habitat.

Response: The refuge evaluates locations of successional management based upon targeted species habitat needs but also through the lens of wetland protection. Riparian area management is discussed in Objective 1.4 in the final CCP and is focused on protecting and enhancing the biological integrity of these wetland systems as directed by Service policy (601 FW3) and founded on one of the purposes of the refuge, to protect wetlands. Increasing cover rather than reducing it along stream and river corridors will help reduce sedimentation, improve water quality and increase habitat values for migratory birds.

6.61 Aspen Management

(Letter ID#: 2, 53, 54, 63, 95, 97, 101, 102, 139, 163, 175, 205)

Comment: Fourteen comments specifically mentioned aspen management. These were all in favor of aspen management and many of the comments thought the stated acreage was too small. One person wanted to assure that aspen cutting was done without leaving slash visible from roadways.

Response: The refuge agrees that the objective for aspen management as stated in the draft CCP/EA was not accurate. In the final CCP, we have changed the language of Objective 3.1 to reflect that 75 percent of the 114 acres will be managed in the 0-15 year age class. We removed language in the strategies identifying the annual target for cutting and replaced this with a statement that identifies the aging nature of the 114 acres of aspen communities requiring accelerated management if these communities are to be maintained as aspen habitat. We included language in Objective 3.1 that identifies the need for the management and conservation of aspen communities not identified in the CCP due to limitations of existing vegetative mapping coverage. When possible the refuge will attempt to prevent aspen slash from being too obvious from local roads. Much of the aspen management will occur away from public roads and homes, however, some areas will be visible from refuge trails.

6.62 Grassland Management

(Letter ID #: 53, 88, 95, 139, 163, 205)

Comment: One person questioned the difference in acreages of proposed grassland management between Alternatives A and B in the draft CCP/EA. Another questioned the acreages between Alternatives B and C stating, "Alternative B identified 3,551 acres (2,482 acres old field, 216 acres grassland and 853 acres shrub) as available for management, whereas alternative C identified 3,525 acres (2,482 acres old field, 190 acres grassland and 853 acres shrub); we question what happened to the 26 acres of grassland?"

Response: The difference in grassland management between Alternative B and Alternative C (Objective 3.3) is that in Alternative C, a 26-acre grassland unit would continue to be managed for grassland species. The 216 acres of grassland identified in Objective 3.3 are acres which are currently managed for grassland species but which were proposed to be managed for early successional shrub species in Alternative B.

Comment: There was a specific suggestion to mow grasslands annually in a serentive design.

Response: The refuge manages habitat to best meet the needs of wildlife species. Grassland rotations of 2-4 years are currently used to maintain nesting habitat for migratory birds. Leaving some fields uncut is important for fledging and migration habitat of priority grassland obligate migratory bird species.

Comment: A respondent asked that mowing be done on a two-year cycle instead of a five-year cycle.

Response: See above response. The refuge uses adaptive management to decide when particular grassland units are cut. Rotations can be shorter or longer depending upon vegetative conditions and the field's use by targeted grassland obligate bird species.

6.63 Alder Management

(Letter ID#: 53, 95)

Comment: Three respondents applauded refuge efforts to plant and manage alder.

Response: Thank you for your comment.

6.64 Shrubland

(Letter ID #: 54, 63, 139, 178)

Comment: Five people were in favor of shrubland management and most wanted the acreage to be sustained or increased. One person suggested using short-term grazing by cattle to manage shrublands.

Response: Of the 3,551 acres listed in Objective 3.3 of the final CCP, 2,698 acres are currently old field or managed grassland habitat which we intend to promote into shrub and early succession forest. Most of these acres are not in need of mowing treatment, but rather in need of encouraging shrub growth through planting, disking or other management techniques. Once shrub and young tree growth establishes in these areas, they will be managed to sustain early successional habitat. Current refuge management has been mowing approximately 25-30 acres of shrubland habitat on a two to four year rotation. Priorities are in areas where hawthorn has been under grown by dense shrub habitat or locations where singing grounds for woodcock are being maintained. The refuge included potential use of grazing animals for management of successional habitats. See strategies listed under Objective 3.1.

6.7 Old Growth Forest

(Letter ID #: 102, 162, 208)

Comment: Three comments were directed toward old growth. Two of these wanted to see the refuge continue its efforts to reestablish or enhance old growth. One commenter felt the refuge is surrounded by mature forests and should focus on early successional forests.

Response: The refuge's plans for forest development are discussed in Objectives 2.3 and 2.4 of the final CCP and aim to move forested habitat on refuge towards mature forest conditions in both hardwood and mixed hardwood-conifer forests. Although it is true the refuge is surrounded by forests, most are not considered, nor have the characteristics of, a mature forest community. Additionally much of these adjacent forested lands do not have management strategies to ensure mature forest characteristics are attained over time. The refuge's forest lands can play a role in managing habitat for these conditions

which may be unique to management of forested lands in the surrounding larger landscape. Additionally, managing for mature forest conditions brings the refuges habitat closer to historic natural conditions as directed by service policy (601 FW3).

6.8 Rare Habitat Types

(Letter ID #: 52, 63, 208)

Comment: Three comments favored protecting rare habitat types. One of these suggested that only foot traffic be allowed in sensitive habitats.

Response: The refuge is committed to protecting rare plant communities. Locations of public use trails are based in part on their impact to refuge resources, including presence and distribution of rare plant communities.

6.9 Invasive Plant Species

(Letter ID #: 162, 208)

Comment: Two comments encouraged a strong program to detect, prevent and eradicate invasives.

Response: Thank you for your comment. Throughout the biological goals and objectives we highlight the need to monitor and treat invasive plant species on refuge lands. See in particular Chapter 4 in the final CCP, under “Actions Common to All of the Alternatives”, where we detail invasive species management.

6.10 Monitoring

(Letter ID #: 13, 60, 175, 195)

Comment: Five people commented about monitoring. One person wanted to see visitor use monitoring and another wanted the refuge to establish clear monitoring protocols.

Response: The refuge currently has a protocol to monitor public use trails on the refuge to ensure they continue to meet compatibility requirements. Monitoring of other aspects of visitor use will be addressed in the visitor services and inventory and monitoring plans. See Chapter 1 in the final CCP for more information on refuge operational plans.

Comment: One person questioned the value of monitoring and felt that 15 years of study was sufficient. One other person felt an extensive inventory list would be much less expensive than continued monitoring and adaptive management.

Response: Monitoring is necessary to ensure that management actions conducted are having the desired effects on habitats and associated wildlife species. The Service is committed to monitoring so that information can be evaluated for success and modified as necessary through adaptive management. As the refuge implements the various measures outlined in the CCP related to habitat manipulation, we will monitor the response as necessary. Without this monitoring the refuge will be unable to determine if the actions taken were effective.

Comment: One person wanted to know about previous wildlife documentation: “is my understanding that all of the data collected for Allegheny Power Systems (primarily by Edwin Michael, PhD) throughout the mid-1980s – 1994 was provided to the CVNWR. This research was conducted on property purchased by the refuge in 2002, the Main Tract. In these studies, the southern water shrew was documented, as were breeding northern harriers. This text and Table A-4 list the southern water shrew as “known or expected, but not yet documented”. Please define what must occur for a species to be “documented” on the refuge.

Breeding woodcock surveys were also conducted during this time and would provide additional data to supplement the surveys conducted on the south end of the refuge since 1999. This is a source of historical data that appears overlooked in this section, and I do not see it referenced in the bibliography section. Where is this data and how has it been used?”

Response: The refuge has received the reports from the wildlife surveys referenced and reviewed these documents for mention of southern water shrews. The southern watershrew is technically another name for the subspecies of northern watershrew (*Sorex palustris punctulatus*) which occurs in West Virginia and the southern Appalachians. From the reports, only one year (1980) had the northern watershrew listed as being found in the study area, as shown in a summary table from later years. Unfortunately the 1980 study report was not received by the refuge and therefore we do not have complete information about the location or numbers of this species found in the valley. We will make changes to Table A-4 as necessary to reflect this information. To be “documented” the species must have a credible observation of presence or of breeding activity. We relied upon the WVDNR natural heritage program to provide documentation information concerning some species on the refuge and it was from this source that the breeding northern harrier citation was derived. Other species documentations have come from refuge staff or other researchers. The reports from Allegheny Power Systems are an important source of historical wildlife and plant communities in Canaan Valley and we hope to rely on these to supply context for changes in wildlife on refuge lands.

7.0 Wildlife

(Letter ID#: 83, 95, 174, 177, 195)

Comment: One person questioned the impact of bicycling on wildlife and stated that to date only four studies have compared the impacts of the sport on wildlife to other users.

Response: The refuge reviewed impacts of bicycle use on refuge resources in Chapter 4 of the draft CCP/EA and in the compatibility determination for bicycle use in appendix B of the draft and final documents. We evaluate impacts on a variety of issues not just to wildlife or how bicycle use compares to other methods used to facilitate wildlife oriented public use activities. Bicycle access does not fall under the designated “Priority Public Uses” of the refuge system and is only permitted on refuge lands when it is deemed necessary to facilitate those Priority Public Uses. For more information about wildlife dependent recreation on National Wildlife Refuges, see Chapter 1 of the final CCP. Impacts of bicycles and other non-priority public uses must be thoroughly evaluated to ensure that such use is appropriate and does not affect the purposes of the refuge or the mission of the Refuge System. The refuge is permitting bicycles on designated trails and has proposed to increase access for bicycles through new trail creation.

Comment: One person agreed that the Indiana Bat and flying squirrel should receive proper management attention.

Response: Thank you for your comment. Please see Objectives 1.2, 1.3, 2.3, 2.4 and 2.5 in the final CCP for strategies dealing with the conservation and management of these species on refuge land.

Comment: One person commented on earthworm health.

Response: Thank you for your comment.

Comment: One person mentioned stocking grouse and another questioned why there was no mention of common (Wilson’s) snipe in the CCP.

Response: The USFWS typically addresses species population management through habitat enhancement rather than stocking. Only in extreme situations, typically when species are endangered, do refuges actively stock wildlife on refuges. Common or Wilson’s snipe are a species of concern in West Virginia and are discussed in Chapter 3 of the final CCP (Chapter 2 of the draft CCP/EA) as well as listed in appendix A. The protection and management of wetlands as detailed in Objectives 1.1, 1.3 and 1.4 in the final CCP address the habitat needs of Wilson’s snipe.

7.1 American Woodcock

(Letter ID #: 1, 2, 52, 60, 63, 95, 101, 113, 175)

Comment: Thirteen people commented on the American woodcock. Most were in favor of maintaining or increasing woodcock habitat management.

Response: Thank you for your comment. The refuge will continue to manage habitat for woodcock and , as described in strategies under Objectives 1.3, 3.1 and 3.2 in the final CCP.

Comment: Two people wanted the refuge to maintain singing and breeding ground. One of those asked if singing ground surveys had already occurred.

Response: The refuge is committed to managing for all stages of the American woodcock’s lifecycle, although migration habitat may be more important for this species in West Virginia and Canaan Valley.

Singing ground surveys are conducted by refuge staff and will continue to be conducted to evaluate success in managing habitat for this species.

Comment: One person asked why so little has been done historically to manage for woodcock.

Response: The refuge has managed aspen, old fields and shrub communities for woodcock since its inception. Large scale cutting projects such as those described under Objective 3.2 in the final CCP were not conducted earlier due to the fact that staff was required to evaluate impacts of significant changes in management and vegetation communities in a NEPA document. The draft CCP/EA provides the NEPA compliance necessary to move forward with larger successional management actions.

Comment: It was specifically suggested that, “I believe that area north of Cortland Road had not seen any plant succession work until that done in the last 5 years in cooperation with RGS and the refuge. More of this type of work should be initiated and new and proven methods such as controlled burning and mechanical cutting -tilling of areas with to control exotic and undesirable species. In the valley proper the continued regeneration of fir, and spruce is important as an escape cover for birds and to keep the northern landscape look. Another very serious problem is the spread of grasses in areas where it once was shaded out. Grass is no friend of woodcock and innovative way to reduce expansion of it in the alder and aspen should be studied to determine best ways to open up areas and expose the soil so birds such as woodcock can get to the worms they feed on. The cattle may be why the birds used the areas more than they do today. The new plan for Canaan Valley should take into consideration what the valley was like when it supported larger numbers of birds, and study the available data up through and including present information to help formulate a new plan.”

Response: Thank you for your comment and suggestions. The refuge is committed to managing habitat for a variety of early successional bird species including American woodcock. We also describe developing woodcock management demonstration areas in collaboration with the Wildlife Management Institute, WVDNR and others to evaluate best management practices for woodcock habitat at the refuge. Techniques such as prescribed fire, controlled grazing and mechanical cutting of vegetation are all described in the CCP as methods to achieve desired habitat conditions.

Comment: A respondent asked the refuge to obtain and study the American Woodcock Conservation Plan.

Response: The refuge consulted the American Woodcock Conservation Plan in the development of the draft CCP/EA. Please refer to Chapter 1 in the draft or final document, where we list it as a document used to help develop biological goals and objectives. It is listed in the bibliography indicating its use in the development of the CCP.

7.2 Migratory Birds

No comments were placed in this category. There were several comments that mentioned migratory birds but their comments were actually about early successional forests.

7.3 Deer

(Letter ID#: 34, 60, 63, 115, 168, 169, 175, 177, 178, 209)

Comment: Eight respondents had general comments about deer and each asked the refuge to thin or reduce the deer population.

Response: The refuge is concerned with impacts of deer browse on refuge habitats and wildlife that rely on those habitats. We outline our concerns of deer browse impacts in several biological objectives and list methods which are proposed to increase deer harvest under Objective 4.1. We are committed to working with the State to find ways to manage the deer population to ensure the ecological integrity of refuge lands.

7.4 Invasive Wildlife Species

There were no comments in this category.

7.5 Threatened and Endangered Species

(Letter ID # 13, 78, 146, 151, 162)

Comment: One person wrote, “Removing rare species tracked by NatureServe and the WV Natural Heritage Program (rail, Wilson’s snipe, American coot, moorhen, and Appalachian cottontail) from the hunt list is highly consistent with the Refuge’s mission and should be done under all Alternatives. If rare species cannot find refuge in a National Wildlife Refuge, where can they hope to recover? I would like to see these species recover to the point where they can be hunted without threat to their long-term viability.”

Response: The refuge proposed removing rare species from refuge hunt lists in Alternative D of the draft CCP/EA. This action was not chosen for the Service-preferred alternative in the draft, or for the final plan, as it is highly unlikely that refuge specific hunter harvest of these species would jeopardize their continued existence on the refuge or in West Virginia. The birds listed are migratory game birds managed by the U.S Fish and Wildlife Service on a flyway basis, with State regulations established within the framework of the Service’s directives. The harvest of these species is likely coincidental with waterfowl hunting and the numbers harvested on the Refuge would not be significant to the overall flyway populations of these species. These decisions on season length and bag limits are made on a flyway basis, and the State’s regulations would reflect any adjustments made by the Service on a national scope.

Habitat conditions, rather than hunting, are likely the predominant factors influencing many of the rare species in WV and in Canaan Valley. For example, Refuge hunt information shows an average of one snipe per year harvested during the years 2002 to 2005. Snipe harvested in West Virginia are likely incidental take by sportsmen engaged in hunting other species; therefore, hunting is expected to have little impact on the local, State or flyway snipe population. No hunter information forms collected since 2002 have reported the harvest of American coot or moorhen and there have been no reports of their presence on the refuge during that time.

In regards to Appalachian cottontails, the refuge is interested in identifying this species on refuge lands through hunter harvest. The Service would work with the State if possible to establish protocol and procedure for collecting and identify samples. This would be accomplished by managing the hunt through a refuge Special Use Permit to ensure that harvested animals could be analyzed to determine the species. However, the small amount of hunter interest and apparent low rabbit harvest from Refuge land indicates that despite low populations of Appalachian cottontail and snowshoe hare, it is highly unlikely that the harvest of these species will have any direct significant impact to local or regional populations. If after hunter harvest samples show a predominance of Appalachian cottontails being harvested, the refuge will consult with the WVDNR to discuss changes in hunting seasons for rabbits in order to ensure continued persistence of this rare mammal on refuge lands.

Comment: A commenter questioned the validity of the Cheat Mountain Salamander habitat. He said, “Now I’m not no college educated fellow, but I’m 73 years old and I have been living in that valley and that swamp since I was 10, hunting, fishing, trapping, everything else and I will tell you now, that little salamander up there (inaudible) extinct (inaudible) and they don’t live in that swamp, they live in the little creeks around (inaudible) side of the mountains under the rocks, under the logs. I lived here for almost ten years at the Swinging Bridge in a cabin year round and I (inaudible) little critters not living in that swamp but yet they say they are going to protect the habitat and I would like to ask you this. I have seen articles in newspapers in different areas where our goal is to preserve and protect the animal habitat and the wildlife. Now we have been here since we was kids and they built that railroad in the early 1900’s and I guarantee you right now today, and anyone (inaudible) in that time can tell you, there is over 120 percent more animals and wildlife in that valley than there ever was. So my question is who and what are they protecting it from?” Also concerning the salamander a commenter wanted to know if their habitat was superimposed on any maps in the document.

Response: Cheat Mountain salamanders do not occur in wetland habitat and it is true that they would not be found in a swamp. It is certainly likely that since the early 1900's wildlife populations have changed over time. Plant communities which were cut and burned following the timber extraction have begun to heal and grow back, altering habitats for wildlife in the valley. The refuge was created in part to protect as well as manage habitats for wildlife as well as to conserve wetlands. Threatened and endangered species are considered "trust wildlife resources" of the U.S. Fish and Wildlife Service and due to their limited distribution and Federal protection under the Endangered Species Act, we generally do not indicate locations of these species on public maps.

Comment: Several people were in favor of habitat protection for threatened and endangered species.

Response: Thank you for your comment. The refuge will protect habitat for threatened and endangered species. See Objectives 1.2, 1.3, 2.3, 2.4 and 2.5 in the final CCP for strategies to manage and protect habitat for endangered Indiana bats and threatened Cheat Mountain salamanders.

Comment: At a public hearing one commenter said, "Our view on endangered species, we are friends of endangered species and our view on that is endangered...the most uncared for and endangered species in the county is the citizens of the county, not all these little critters crawling in the swamps. Now we have protected this valley for all these years of our lives. The deer have browsed through this valley all these years. Everything was fine, everything was pristine or you people wouldn't want it to start with, so don't kick us out in the cold and act like we don't know what we are doing because we took care of that valley that you now have that we paid for and we will continue to help take care of it but we have to work together on it and have to be open. There are issues, other issues, I will discuss throughout the night... or evening, or night, whichever it takes, I don't care. But if it's going...what you just said, I will hold you to that and everybody here heard you because my endorsement was not to infringe on these people's private business throughout all this but also realize you are in the middle of something where you have to stay away from the swamps or the wetlands as you guys like to call them, we call them swamps, to protect all these little things and I don't read the paper much but I just happen to see one article where these created wetlands amazingly enough...these little critters are moving into these wetlands. Well if you build a swamp, something is going to live in it, it will go to it and if it ain't there, it will live where he come from but I will continue to work with you but we are going to have some stuff to iron out. You know that and I know it and you got enough people here, a whole boatload is what we are talking about that if the time comes, I want to be there but since I endorsed this for the town and I explain to the council when I come back, it was...to me it was going to interconnect all the trails through the valley clear around back, which will be good for the economics for the area. That's why we did it and we even authorized as far as we can authorize (inaudible) some of the funding for this because if we put our blessing on it and it looks better (inaudible) going down the road but if it's going to encroach on these people, I'm not for it but if you keep your word on it, and I will be right there to make sure you do or you are going to hear about it, then I'm out of it. But if you do what you say, he will be watching you and we will all be watching you."

Response: Thank you for your comment. The refuge is always willing to work with the community to help protect threatened and endangered species, wetland habitat and other resources the refuge was established to protect.

7.6 Snowshoe Hare

(Letter ID #: 53, 139)

Comment: One respondent asked the refuge to join the WV Division of Wildlife Resources in their hare study program and the refuge should survey refuge hunters. Another respondent felt the hare should receive more attention in the CCP.

Response: Thank you for your comment. Snowshoe hare have been documented on the refuge but little information exists on their distribution or abundance on refuge lands. We will consult with the WVDNR and are very willing to collaborate with any ongoing or new hare studies or research projects.

7.7 Waterfowl

(Letter ID #: 141)

Comment: One respondent was concerned that waterfowl were not mentioned in the executive summary.

Response: We regret that readers did not see any information about waterfowl in the executive summary. Please refer to the final CCP for discussions of waterfowl in Canaan Valley, specifically Chapter 3 (Affected Environment) and Chapter 4, Objective 1.4

7.8 Fisheries

(Letter ID # 60, 195)

Comment: Three commenters talked about fisheries. One mentioned keeping water temperature records. Another mentioned maintaining eastern brook trout habitat. The other simply wanted the DNR to manage the refuge's fishery resource.

Response: The refuge is concerned with maintaining water quality consistent with the needs for brook trout habitat. Brook trout are discussed as a species of concern in the refuge CCP and specifically addressed in Objective 1.4 in the final CCP. Maintaining and improving brook trout habitat are included as strategies to fulfill this objective. The WVDNR does manage fisheries in the State and we look forward to working with them on habitat evaluations, restoration and enhancement projects that support native brook trout.

8.0 Public Access

Public Access was by far the comment category that received the most comments from the public. It was broken into fourteen categories.

8.1 Public Access and Public Use (General comments)

(Letter ID#: 25, 33, 41, 42, 51, 52, 59, 60, 65, 90, 115, 124, 129, 134, 141, 149, 162, 175, 176, 179, 180, 187, 207, 208, 209)

Comment: Thirty-four people had general comments concerning public access. Most of these wanted to see some form of increased public access.

Response: The final CCP expands and enhances opportunities for all the six priority public uses, including wildlife observation, wildlife photography, environmental education and interpretation. These enhancements include more public access points, more trail miles, and more trail connections to create looped trails.

Comment: One person doubted that public use was contradictory to natural preservation.

Response: We agree that not all public uses are contradictory to natural preservation. We believe any public use that is found appropriate (i.e., complies with applicable laws and regulations, is consistent with applicable Executive orders and Department and Service policies, etc.) and compatible (will not materially interfere with or detract from fulfilling refuge purposes and the mission of the Refuge System) is, by definition, not contradictory to natural preservation. We further believe that wildlife-dependent public uses connect people with nature and encourage stewardship of our natural resources. For more information about appropriate and compatible uses, refer to appendix B of the final CCP.

Comment: A person asked about whether the public access process would continue to be evaluated over the next 15 years.

Response: While we are always evaluating the refuge's public use program in an effort to determine how we can best respond to the public's needs, all trails on the refuge have been evaluated. Over the next 15 years, we will focus our efforts on the future trail extensions and connections outlined in the final CCP. Some of these new trails will require additional NEPA analysis and additional public input. We will also be working on a new visitor services plan, which may require public input. The public will be notified of any such actions and will be given ample opportunity to provide input.

Comment: One person asked if fishing access would be limited.

Response: The final CCP states we will allow fishing wherever an approved road or trail meets a river, stream or pond. Following completion of this CCP, we will solicit public input to help us develop a fishing plan that will state more specifically where fishing is allowed on the refuge.

Comment: A respondent wanted to know why bicyclers could access certain areas of the refuge but wheelchairs were prohibited.

Response: Areas of the refuge that are specifically ADA-accessible include Freeland Trail, fishing pier on Timberline Road, the Visitors Center, and reserved hunt blinds. Other areas of the refuge are not suitable or safe for wheelchairs because of grade, substrate, terrain or other factors.

Comment: Access should not be discriminatory according to a person who wrote, “All allowable wildlife dependant recreational activities should get equal access to refuge lands, and have rules and regulations applied evenly. The current and proposed policy is discriminatory. It gives some users preferential treatment with things like access, dogs, nighttime use etc. and restricts others with equally as credible and legitimately appropriate uses from having the same privileges.”

Response: We refer the reader to our response to the second comment in this section where we describe the process for finding public uses appropriate and compatible.

Comment: Many people wanted to see more trail connectivity.

Response: The final CCP details our plans for additional trail connectivity on the refuge. See goal 4, objective 4.3 for details. In addition, the refuge will continue to work with adjacent land managers to promote and implement a “Heart of the Highlands” system of connected trails.

Comment: A few people wanted limited four-wheeler access: “At my age and health it is very hard to hunt and drag a deer from the Refuge without good access. I would like to see some limited four wheeler access roads during deer season off Cortland road. If you go to the end of Cortland Road and climb the mountain up to the top you have to be in good shape and this is restrictive to people like myself. I would be willing to pay more if I had better access and the funds could be used for staff and conservation programs.”

Response: One of the guiding principles of the hunting program, according to new Fish and Wildlife policy (605 FW 2), is to provide opportunities for quality recreational and educational experiences. As we described in the draft CCP/EA, under alternative A, goal 4, objective 4.1 (page 3-26), we interpret this to mean that refuge hunt programs should promote positive hunting values and hunter ethics such as fair chase and sportsmanship. In general, hunting on refuges should be superior to that available on other public or private land and should provide participants with reasonable harvest opportunities, uncrowded conditions, fewer conflicts between hunters, relatively undisturbed wildlife, and limited interference from or dependence on mechanized aspects of the sport.

We understand that different viewpoints will result in different interpretations of what constitutes a “quality” hunt and we appreciate that it is not possible for some hunters to walk long distances. We addressed this latter issue in the final CCP (and in the draft CCP/EA), under goal 4, objective 4.1, by offering to provide a shuttle service to facilitate deer removal during certain times of open deer season. Although some hunters feel the refuge should provide additional opportunities for motorized access, we feel there are ample opportunities in nearby areas off-refuge for hunting with Off-Road-Vehicles (ORVs), and this is not the type of experience we wish to provide at the refuge . Damage to valley resources by off-road vehicles is well documented in a report by Ben Stout (1993).

Comment: A respondent thought the refuge’s estimate of 15 percent visitor increase was too low.

Response: The estimated increase in visitor use under each alternative in the draft CCP/EA is exactly that – an estimate. We acknowledge that this estimate may be too low, or it may be too high. Only time will tell.

Comment: Several people wrote that there should be more restrictions to access as this is a wildlife refuge and should protect natural resources. One thought it was a daunting task to control access in that there are some thirty million people within 4-5 hours of Canaan NWR.

Response: As we mention in previous responses in the section, some forms of public access are appropriate and compatible, and some are not. As in our previous responses, we refer readers to appendix B to learn more about how the Service determines whether a public use is appropriate and compatible.

Comment: One negative comment said, “This misguided pseudo-environmental anti human policy has been carried out in Canaan Valley by [staff at Canaan Valley refuge]. These individuals are truly anti-environmental because they are preventing present and future generations of true environmentalists’ access to Canaan Valley. These...public servants need to be sent to Alaska or Nevada where they can lord over a Refuge without the hassles of human beings interfering with their ridiculous, and idealistic management practices. The condescending and elitist attitude expressed by your office, and Refuge employees has done irreparable damage to the Service and the Canaan Refuge. This can only begin to be repaired with your commitment to public involvement, and the increased access to the Refuge that was outlined in the Station Management Plan. I do not support any of your silly options outlined in the draft CCP. If I had to choose one, it would be Alternative B, with the increased access from Alternative C, no more trail closures, but with major revisions. The main rail grade from Camp 70 across the Valley needs to be opened. The original hydrology study done over ten years ago supports this. This rail grade provides the best access and the most environmentally sound path across the Valley. The engineering cost analysis of several of the cross-Valley routes done by a Boston based company was a ridiculous exaggeration, and obviously a set-up operation that did not go out for bid, and came up with the prescribed result desired by your office. In addition, opening this trail would solve the problem of a new trail coming anywhere near a residential area.” Another commenter said roads destroy wildlife habitat; they don’t create it.

Response: We find these negative comments to be unfortunate. In regards to a cross-valley trail from Camp 70, we addressed this issue in the draft CCP/EA, pp. 1-22 through 1-23, under “Issues Considered but not Further Analyzed in this draft CCP/EA,” where we explain why this trail is not a realistic or viable option for the refuge at this time.

8.11 General Comments on Trails or Roads

(Letter ID#: 6, 21, 25, 38, 42, 57, 58, 59, 60, 98, 101, 106, 113, 114, 120, 121, 122, 138, 140, 143, 158, 162, 165, 169, 170, 175, 146, 179, 181, 182, 187, 189, 195, 201, 208)

There were about 43 general comments about trails or roads.

Comment: One person felt the refuge and its trail system has proved to be very good neighbors.

Response: We appreciate the support provided by this comment.

Comment: Many people wanted to see the refuge expand the total miles of trails within its boundaries. Some saw this as a benefit to the economy for example stating, “I would like to encourage the Refuge staff in one or the other of these alternatives to think about re-evaluating the existing trails on the Refuge to determine the possible expansion of their use designations and also expand at the same time...expand the total miles of trails on the refuge. I believe that that is going to be huge to the economic development of this area.” While some others were opposed to more trails, as reflected in the following quote, “We are concerned and opposed to the building of trails across the valley or through prime wildlife habitat. The increased traffic could be very detrimental to this habitat and its natural inhabitants. Restriction of access to these areas north of Cortland Road (Old Timberland Rd) is critical for protection of habitat for upland birds. While we do acknowledge that trails for hiking, biking and related activities are important, there are over 375 miles of these trails, most of which also offer wildlife viewing, within about a one hour drive from the refuge. (Ref: wvtrails.com). Therefore building more trails with funding which could be used much more constructively should not be a high priority.” Some felt that more trails would jeopardize wildlife habitat with statements such as: “Now our members are concerned and are opposed to the building of trails across the valley or through any prime wildlife habitat.”

Response: We recognize that there will always be a difference of opinion regarding how many miles of refuge trails are open to the public. We feel that the final CCP strikes a balance between offering quality, wildlife-dependent recreational uses, and protecting the refuge’s most valuable natural resources such as wetlands and other habitats associated with threatened, endangered or rare species. For more details on current and new refuge trails, see goal 4, objective 4.3 in the final CCP.

Comment: Several people commented that ski trails should be maintained. A representative comments states: “Ski trails are the most popular and heavily used trails on the Refuge. They provide important trail connectivity between Refuge recreational trails and facilities and trails on adjoining lands (see “increased trail connectivity” above). We have read and in general support the position of White Grass Ski Touring Center regarding the future use of Three Mile and Powderline Trails. White Grass has been a valuable contributor towards meeting many of the Refuge’s important visitor use, volunteer, conservation and education goals. These ski trails are important to maintaining the delicate balance of these facilities being profitable and able to continue. All efforts should be made to do research and develop innovative means to limit the impact the trails have on protected species. Ways should be developed to mitigate any habitat degradation to allow these important Refuge visitor use areas to remain open to public use in a safe manner. Some people felt that property values would increase with more trails within the refuge.”

Response: We agree that the environmental education and interpretation programs offered at White Grass Ski Touring Center (White Grass) help to foster environmental stewardship within the local community and beyond. The final CCP states that we will modify some trails (i.e., revegetate trail edges) for the purposes of improving habitat for the Cheat Mountain Salamander. The Cheat Mountain salamander is a threatened species and a priority for Service protection and management, according to the Endangered Species Act. The Service is therefore obligated to improve or enhance habitat for this species wherever and whenever possible. We will also increase monitoring on some trails to further our understanding of how these trails affect the salamanders, if at all, and to determine if there are other ways to improve salamander habitat. For more details on these strategies, see goal 4, objective 4.3 in the final CCP.

Comment: Several other people wanted to make sure mountain biking had adequate access to trails: “It would be a huge tragedy if even more trails were lost as our access between systems or areas are already fragmented. Mountain bikers have already suffered the loss of riding many miles of trails in the Dolly Sods North area just last year as it was designated a wilderness area. Other trails in the NWR have been closed in years past also. The Canaan Valley area has been featured in USA Today as being one of the top 10 towns with big backyards, and has always been featured as an outdoor mecca for lovers of outdoor recreation of all types. The NWR here seems to consume most of the land in the area, so residents and tourism itself (which is the only economy here) are really at their mercy. So I hope we can all work together to satisfy all parties and work on keeping and establishing the few sustainable non-impacting connector trails needed to get from point A to B by foot, bike or skis.”

Response: We applaud this comment because it recognizes the importance of collaboration in the process of developing solutions to difficult issues. We agree that tourism is essential to the local economy and we are committed to doing our part to support this important industry, while at the same time ensuring compatibility with refuge purposes. Therefore, the final CCP states that we will expand the current bicycling opportunities by connecting bicycling trails and opening new trails, or portions of current trails, to bicycling. For more details on bicycling on the refuge, see goal 4, objective 4.3 in the final CCP.

Comment: One person thought all public roads and trails should be re-evaluated and all compatible uses should be allowed.

Response: Through the draft CCP/EA, all roads and trails were re-evaluated and all uses that were found to be compatible will be allowed on designated roads and trails (see appendix B of the final CCP). The six priority, wildlife-dependent public uses will be evaluated for compatibility every 15 years, and all other uses will be evaluated for compatibility every 10 years. However, the refuge manager may re-evaluate the compatibility of a use at any time (603 FW 2, parts 2.11 and 2.12). For example, we may revisit a decision sooner if new information reveals unacceptable impacts or incompatibility with refuge purposes. We will continue to follow the Refuge Improvement Act and the Compatibility Policy in determining which public uses to allow on the refuge.

Comment: The Tucker County Planning Commission wanted to see the addition of more trails.

Response: For details on where and how the trail system will be expanded in the final CCP, see goal 4, objective 4.3

Comment: Several people and organizations offered to help with trail maintenance and construction.

Response: We truly appreciate the offer of assistance and we will advertise volunteer opportunities on the refuge's web site. Those interested in helping with trail maintenance and construction should consider participating in the refuge's "Adopt-a-Trail" program. For more information contact Jackie Burns (304)866-3858 x35 or Glenda Crawford at the Trail Mix.

Comment: One person was not in favor of planting more trees along sections of trails to protect Cheat Mountain salamanders. Concerning revegetating along trails, several respondents felt that abandoned logging roads and trails should be revegetated, but not along currently used trails.

Response: The Cheat Mountain salamander is a threatened species and a priority for Service protection and management, according to the Endangered Species Act. The Service is therefore obligated to improve or enhance habitat for this species wherever and whenever possible. Therefore, the final CCP states that we will improve habitat on certain cross-country ski trails where these salamanders are known to exist. One method we propose is planting native trees on the edges of the trails to increase canopy cover. Increasing canopy cover will help improve leaf litter cover and decrease light penetration to the forest floor. For more information on strategies related to improving Cheat Mountain Salamander habitat, refer to goal 4, objective 4.3 in the final CCP.

Comment: A couple people opposed removing the old railroad grade. Another person wrote, "The closure of this main thoroughfare by Refuge management, without proof of wildlife or wild land impact, and against the wishes of all of the public that uses the Valley for wildlife dependant recreation, illustrates the problem that the mismanagement of the Refuge has created. The anti-democratic policy of guilty until proven innocent used by the Service here in Canaan needs to be abolished. Your failure to show any damage by non-motorized human recreation here backs this assertion up. Any future trail closures need to be studied first, and exposed to public scrutiny. Your closure, and destruction of the swinging bridge by the powers that be, without any input from the public, or replacement of the bridge, perfectly illustrates the arrogant attitude you possess. This cannot continue without further destruction of your reputation, although it can't become much worse. Considering the size of the Refuge staff and the budget, it is a mystery to me what all these people do for a living. The trail system is a mess, and gets very little maintenance. I guess everyone is too busy researching excuses, and closing trails to do any work on them. The effort put out here to enhance your "big six" priority public uses is nothing more than pathetic. The ignorance and apathy shown towards the trail system has had a negative economic impact on our tourist economy. Because of unsubstantiated trail closures by the Refuge, an excellent trail system was severely fragmented. Instead of working on improving this trail system, we are now trying to put the pieces back together again, and being forced to wade through the bureaucratic, regulation laden, and ridiculously overpriced process that the Service requires. The connections from Camp 70 to the other side of the Valley, from Rt. 32 to Canaan Valley State Park, from the Beall tract to the Main tract, and from Camp 70 to the CVI lands on river left need to be reestablished. The policy of closure of certain major trails to bicycles, but not to pedestrians has never been shown to be supported by valid evidence of any reason for this segregation. Specifically the trails on the Beall and Main tracts need to be reviewed, and reasons for this policy need to be clarified, or the trails reopened to bicycles. Sorry, but Refuge staff's personal prejudices are not a good enough reason for the basis of this division. Obviously, my belief that anyone will actually take any actions on these problems, let alone read this letter, is not very strong. This is due to the Service's record of not responding to the public, and their disregard for their own rules regarding public comment and participation on the numerous Compatibility Determinations resulting in trail closures. A problem I have noticed is the micromanagement of the Refuge by Hadley. I appreciate the impression given by the current Refuge manager, Mr. Shaffler, that he is trying to create trails, open trails and reestablish connections to other surrounding recreation areas. Please allow the people on the ground here in Canaan to call the shots. The mismanagers in Hadley are pathetically deficient in their knowledge of local lands, population and economy, so quit trying to run the show here in the Valley!"

Response: There are two old railroad grades that cut east-west across the valley. The northern-most railroad grade comes out of the Brown Mountain Overlook Trail and it is on this old railroad grade that we proposed in alternative C of the draft CCP/EA to create a new trail. While we appreciate the fact that this trail may have been open to the public before the Service acquired the property on which the trail is located, we did not choose this strategy for the Service-preferred alternative (alternative B) largely because of the trail's potential adverse impacts on the refuge's wetlands and associated plant communities. We determined that developing this trail would not contribute to achieving the refuge's purposes, vision, and goals, and it would not contribute to the conservation of Federal trust resources. See the draft CCP/EA, pp. 4-85 through 4-88, for a discussion on the potential impacts of this trail, which will further explain our reasons for not including this action in the final CCP.

Regarding other trails, the refuge conducted appropriateness and compatibility determinations on bicycling first in 2003 and again during the CCP process. Through these processes, the refuge determined which trails can accommodate bicycling without materially interfering with the refuge purposes and the mission of the National Wildlife Refuge System. If new, compelling information presents itself we will consider reviewing these trails for other public uses.

A second old railroad grade to the south was addressed in the draft CCP/EA, under "Issues Considered but not Further Analyzed in this draft CCP/EA," as stated in a previous response under category 8.0.

Comment: Trail width was addressed by one commenter as a safety issue. They wanted wider trail corridors for safer winter skiing conditions

Response: The need to modify some cross-country ski trails (i.e., revegetate trail edges) for the purposes of improving habitat for the Cheat Mountain Salamander is addressed earlier in this section.

Comment: Many people supported a general north-south trail within the refuge.

Response: We appreciate the community's support for the general idea of a north-south trail within the refuge. The final CCP states that we will create such a trail, most likely from the Swinging Bridge Trail to Cortland Road. This proposed trail will require further NEPA analysis and public review before a final route is selected.

Comment: Canoe routes were suggested by one commenter.

Response: Visitors are permitted to canoe the Blackwater River through the refuge. Canoeists may put in at Timberline Road or Old Timberline Road, and may take out at Camp 70. For more details on canoeing, see goal 4, objective 4.3 in the final CCP.

Comment: Several people wanted to make sure buffer zones were placed between trails and private property.

Response: We assume this comment refers to the proposed north-south route from the Swinging Bridge Trail to Cortland Road. The proposed route as it was illustrated on the alternative B map in the draft CCP/EA appeared to follow property lines of many homeowners along Cortland Road. As previously stated, the exact route of this trail has not been decided and will require additional NEPA analysis. We will take this comment into consideration as we move forward with the more detailed planning analysis of this trail.

Comment: Some people wanted the refuge to minimize trail building. A representative comment states, "Minimize trail building. The Camp 70 to Cortland Road plan is acceptable because it is along

the boundary of the refuge. Additional trails across or through the refuge is extremely objectionable. There are hundreds of miles of trails surrounding the refuge.”

Response: In the final CCP, we feel the number of new trail miles appropriately responds to the public’s request for more trail connectivity, yet does not detract from the refuge’s wilderness character.

8.12 Specific Trails, Roads or Areas

(Letter ID#: 3, 6, 13, 25, 40, 41, 42, 45, 47, 49, 51, 52, 54, 55, 56, 57, 59, 60, 64, 67, 76, 92, 93, 94, 96, 97, 100, 103, 104, 105, 106, 107, 108, 109, 110, 112, 116, 118, 132, 133, 134, 141, 143, 144, 145, 146, 149, 150, 155, 162, 165, 167, 168, 169, 173, 174, 175, 176, 179, 181, 183, 187, 189, 192, 194, 195, 199, 200, 202, 203, 204, 205, 206, 207, 209)

Within all categories this particular category received the most comments. Most people commented on a proposed trail which the public perceived would be along private property. This generated many comments, from private citizens to organizations to the State representatives to the governor of West Virginia. In addition, three petitions were signed from property owners near the refuge denouncing the proposed route. Almost all of these comments were not opposed to a north-south trail within the refuge and in fact supported such a trail. However, they believed the proposed trail would abut private land.

Comment: “...I am gratified to know that the plan alternatives offer increased hiking, hunting, fishing opportunities for visitors who hope to enjoy a wilderness experience in the refuge. With regard to the specifics of the plan, I do have serious concerns regarding suggested routes for hiking and biking trails. Let me emphasize that none of the alternatives under consideration affect me personally, however, this past weekend as I was approached by a number of Tucker County citizens and Canaan Valley residents, particularly distraught and concerned regarding the placement of these trails and immediate proximity to private homes. All the interested parties support a national wildlife trail in Canaan Valley but they emphasize the desire to have a true wildlife experience. When you place trails near homes, the visitors of those trails do not fully benefit from an exclusive nature wildlife experience and retreat as other trail options may present. Accordingly, I respectfully request that you consider any trail alternative plan that is not in plain sight of the residents of Canaan Valley. This would be a benefit to both the residents and the visitors. With thousands of acres in the refuge, I am confident that there are numerous options to the proposed alternatives that would enhance the opportunity to provide true wilderness experiences for visitors.” Another commenter stated that a trail near private property could become a legal issue.

There were a couple comments that stated a trail near private property would enhance safety as local residents would utilize the trail and watch out for each other. Another person said that hikers are out to hike and not interested in other people’s property.

Several respondents offered suggestions to insure that specific trails had buffer zones if located near private property.

Response: As we stated in the draft CCP/EA, and as we state in this final CCP, the proposal of a trail connecting the north and south ends of the refuge will require additional NEPA analysis before it is implemented because we have not yet decided on the site-specific characteristics of this proposed trail. We admit it was misleading to show a specific trail route on the alternative B public use map in the draft CCP/EA when we were not certain about which specific route that trail would take. We included this trail on the alternative B map to generate comments from the public regarding the idea of a general route, but the informal “line on a map” was insensitive to the neighboring community and we apologize for causing the unnecessary angst among local residents of Canaan Valley. Once we involve the community in developing a more detailed proposal, we will present alternatives to the public, solicit comments, discuss the preferred alternative as needed and then distribute a final plan. We will use e-mails, web postings and mailings to notify the public of any meetings and other opportunities to be involved in the development of the route. All the comments we have received

through this comment process regarding this specific trail will be taken into consideration when we begin the next phase of planning for this trail connection. In response to the many comments we received about this trail, we have amended the public use map for the final CCP to show the general vicinity where we envision a trail connecting the north end of the refuge to the south end, rather than showing a specific trail route.

Comment: Concerning Timberline area a commenter wrote, “No reference is made to the current access point within the Timberline Development that is referred to by refuge staff as an “administrative access” but serves as an access point to anyone living or visiting within the Timberline development area for the Middle Valley Trail (6.2 mile), Blackwater View Trail (1.4 mile) and those trails connected to these that are otherwise accessible to the general public only by the A-Frame Road Access. It functions as and is perceived in the community as a “private access” to the refuge. Additionally, no reference is made to the access provided by the right of way that Timberline Resort has through the refuge on Winterset Road (Idleman’s Run Road) that serves, again, as a “private access” to Idleman’s Run Trail (.39 mile) and Forest Road 80 (2.0 mile) for residents of and visitors to that area. These two areas should be documented and addressed within this background information and their current management outlined in Alternative A and compared in the other alternatives. I understand that the Timberline access was used in 2009 for additional deer hunting access. Include the details of this information in the background/Alternative A information.”

Response: We understand that there is limited access to Middle Valley and adjacent trails. For this reason the final CCP states that the refuge will provide a parking lot and a trail connection from the Beall trails to Blackwater View Trail. This will enable visitors to park at Beall and access trails on the Main tract by foot, horse or bicycle, rather than having to drive to A-Frame Road to do the same.

Regarding the “road” from Winterset Road (Idleman’s Run Road) to Forest Road 80, the refuge has no knowledge of restrictions on public access. The refuge provides access to Idleman’s Run Trail and Forest Road 80 via Freeland Road and Forest Road 80, which are both open to the public. We do not promote access to either of those areas any other way.

Comment: Trail connectivity to specific areas concerned many commenters. Areas of concern were Beall to Middle Ridge Trail; Camp 70 area; Heart of Highlands trail system and connectivity with Canaan Valley State Park. Some people wanted to expand a trail system from Beall through Harper Tract and the Thompson area.

Bicyclists wanted to see the Cortland Road area opened to bicycling by connecting Beall to Middle Ridge. Some respondents also wanted the Brown Mountain Overlook Trail as well as Heart of Highlands trail system opened to bicycling.

Another commenter said, “You might take the access to Middle Ridge out of Alternative C and put it over into the preferred alternative and that would be a good move.”

Response: Trail connectivity for all public uses was identified as an issue during public scoping, as noted in Chapter 2 of the final CCP. We therefore made a point to address this issue in the draft CCP/EA. The result is several strategies in the final CCP that connect trails on and off refuge and offer a variety of public uses when and where appropriate and compatible. For a description on actions related to trail connectivity in the final CCP, see goal 4, objective 4.3. For an illustrated rendering of newly connected trails, see the public use map in the final CCP.

Comment: One person was opposed to closing sections of the 3-Mile Trail and Powderline Trail and others stated this was the only safe access to Bald Knob.

Response: The proposal to close these two trails was part of Alternative D of the draft CCP/EA, which was not the alternative chosen for the final CCP. Therefore, this strategy is not included in the final CCP and therefore will not be implemented.

Comment: Several respondents opposed closing access to Freeland Tract to hunting or walking with dogs.

Response: As we explained in the draft CCP/EA, and in the final CCP, under goal 4, objective 4.3, the Freeland tract will be closed to public hunting, fishing, and walking with dogs, to promote a quality wildlife observation/education experience without other competing public uses. However, due to the refuge's concern with deer impacts to plant communities, particularly the rare conifer wetland community on the Freeland Tract, we will permit special hunts such as youth hunts and a special hunt for the physically disabled. We may also permit limited open hunts during the deer firearms season should browse damage indicate that closure of this tract has exacerbated deer damage.

Comment: One person suggested the refuge should accurately map the current and historic trail system: "Over 100 miles of trails were closed by the Refuge after the purchase of the Main tract, without any mapping, cataloguing or assessment. The trails that were closed on the Herz, and Elkins and Kelly tracts prior to that purchase were all done without the public participation or comment required by the Refuge Improvement Act. The one hydrology study of the cross-Valley railroad grade has been ignored. In other words, the desire of the USFWS to keep humans out of Canaan Valley has been implemented with a disregard for the Service's own rules and regulations. The Station Management Plan, which was the guiding document for the Refuge until now, has been ignored from day one, and was declared illegal by Refuge manager Kevin DesRoberts back in 1999."

Response: When we first acquired the Main Tract (the largest tract on the refuge), we mapped all the trails on this property. We then developed criteria for determining which trails to open to public use. When developing criteria, we consulted literature regarding trail evaluation, and we solicited expert opinion from experts in trail evaluation. Additionally, refuge staff brought in a hydrologist, a soil scientist, and an expert in wetland restoration to evaluate the railgrade and other potential trails. Soil types were obtained from county soil surveys. Recommended uses of soil types were also considered in evaluating trails. All this information was used to develop compatibility determinations in 2002-2003. After the compatibility determinations were released for public review, revised, and finalized, the refuge opened 31 miles of trail year-round, and an additional 10 miles of winter-only cross-country ski trails. For more information about this process, request a "Compatibility Determination Summary" from the refuge.

Under the final CCP, an additional 3.8 miles of trail will be open to public use. Through the compatibility process, the refuge has worked diligently to ensure the trails which are open to public access have the least impact on the biological resources while also offering the most quality wildlife-dependent recreational experience.

Comment: A respondent wanted access to the A-Frame area opened. Another wanted the refuge to: "...work out an arrangement with the Mountain Top Hunting Club so that people could use the two Cabin Mountain trails that begin at the end of A Frame Road and lead to the top of Cabin Mountain overlooking the Dobbin Slashings Bog. Many people camp on Raven Ridge within the Dolly Sods Wilderness, an easy walk from the parking area at the end of A Frame Road."

Response: Current legal restrictions prevent public access to the landlocked area north of the Main Tract. We will continue to look for opportunities to partner with adjacent landowners on trail connections in the area of the Cabin Mountain Trails.

Comment: One person felt access for White Grass was preferential versus the rest of the general public, writing, "...In the past, there seems to be special dispensation granted to some users and not granted to others. I can specifically mention White Grass or other events that are upcoming that are allowed to use refuge for profit but then other areas and other people are not. ... I think there in fact is a process ... it seems as though the process is biased and that's only from someone who has been involved in the process and been refused. So it is concerning and yet I have a vested interest in it as I'm running a mountain bike program and being a past business owner in the valley and I don't want to hurt Chip or hurt anyone else but, you know, it really is a...it's something that I would like

to see not happen for 15 additional years. Not to say that he shouldn't be allowed to run his business but others should be allowed the same privilege. ...in the six [wildlife-dependent recreational uses] ... of the refuge, I don't see where ... it should exclude one or include only one. In a nutshell, could you explain what the compatibility is?"

Response: Allowing White Grass to operate some of its cross-country skiing and snowshoeing business on refuge lands constitutes a commercial use. Commercial uses on the refuge are evaluated on an individual basis using appropriate use and compatibility determinations, pursuant to 50 CFR § 25.61. We completed both an appropriate use determination and a compatibility determination for this commercial use as part of appendix B. Until the final CCP, this use has occurred pursuant to an annual special use permit issued by the refuge to White Grass under specific conditions. In the final CCP, we state that within five years of CCP approval, we will convert this special use permit to a concession contract, pursuant to Director's Order 139 and 50 C.F.R. 25.61. This Director's Order states that project leaders may use concession contracts to provide wildlife-dependent and other activities detailed in the National Wildlife Refuge System Improvement Act of 1997. This new process will require the refuge to prepare a prospectus and notify the public of available opportunities to operate a commercial concession on Federal land. Existing and previous concessionaires and any other interested parties will receive a copy of the public notice, making this a competitive process. We will conduct additional NEPA analysis if required.

Comment: Concerning access restriction, a person stated, "Restriction of access to those areas north of Cortland Road and Old Timberland Road for continued protection of the habitat for upland birds and other wildlife."

Response: Comment noted.

Comment: Several people wanted the A-Frame road repaired in its entirety.

Response: The portion of A-Frame Road which is in the greatest disrepair is the first four miles of this road, which the refuge does not own. Since we have no jurisdiction over this portion of the road, we are in no position to make improvements.

Comment: Many people commented on the Camp 70 road and access. These comments can be summarized by the following quote: "There are several ideas I support...[one] is to maintain Camp 70 road past the current parking area as a public vehicle access and perhaps put in an overlook of the valley view. This should be done regardless of ownership of camp 70." Other people commented on general road conditions and trail connectivity for this road and area. For example, one person wrote, "While appreciating refuge staffs desire to close Delta 13 Road/Camp 70 Loop, we believe they may be missing a unique Opportunity to provide vehicular access into this part of the valley. We encourage refuge staff to pursue abandonment of this portion of roadway by the WV Department of Transportation, thus allowing the Service to assume management control of the road. This will facilitate improvements to the pre-existing, but poorly conditioned Delta 13 road and the eventual creation of a scenic overlook at the terminus approximately 0.8 miles further into the refuge than currently exists. Not only will the hunting public benefit from this enhancement, but it will allow daily visitors access to an overlook area and potentially an observation platform from which to view the valley." Many people wanted the refuge to make sure the Camp 70 Road remained open.

Response: In response to comments about Camp 70 road, we have revised alternative B of the draft CCP/EA. As stated in the final CCP, goal 4, objective 4.3, we will work with WV Department of Highway (WVDOH) to develop a plan for improving this roadway for access by pedestrians, biking, horseback riding, and vehicles. The road will be improved from the refuge boundary to the northern portion of the loop, where it will end with a parking lot and a hardened overlook. The remainder of this road, starting with the southern portion of the loop and heading east, will be abandoned and maintained as a trail for pedestrian, biking, and horseback riding only. Once plans for the improved road and overlook are finalized, refuge staff will initiate the necessary environmental review and

compliance process. Implementation of the plan can only begin when that process is complete, and when the refuge gains jurisdiction over the road. For more information, please refer to the final CCP.

Comment: One person wanted to see vehicle access connectivity to the Dolly Sod Wilderness: “An additional change that I would like to see added to Alternative B would be vehicle access connectivity from the refuge to the Dolly Sod Wilderness area. I know that this is much more easily said than done, but due to the increase in hunters and hikers in the refuge, a road between these areas would be beneficial for emergency access issues, in the very least. Having it open to the public would also provide alternative entrance and exit from Dolly Sod, be much better than present routes, and one that would increase use and tourism for both areas. If not a practical suggestion now, inclusion in a future improvement plan should be considered.”

Response: Currently the refuge provides access to Dolly Sods via Forest Road 80, which is open to pedestrians, horses, bicycles and vehicles. Vehicle and bicycle access is prohibited beyond the refuge boundary because Dolly Sods is a designated wilderness area and, as such, prohibits mechanized and motorized transportation. Only horses and pedestrians may travel into the wilderness area.

Comment: A respondent wanted the refuge to add the Big Chain Ring Trail: “.....add the Big Chain Ring trail to the existing trail development plan of the “Heart of the Highland Trail” organized and managed by Canaan Valley Wild Life Refuge. (see attached map of the area). The resort is a large and vital contributor to the economy of Canaan Valley with a trail system for recreational use tailoring to beginners and experts but above all, its trail system is designed for family activities. The owners and the management of Timberline Four Seasons Resort were not notified of the final phase of the planning of Heart of the Highland Trail System therefore that are late in requesting for one of their trails to be taken in consideration as an additional loop to the existing planned system. We feel that this particular trail will be a great asset for numerous reasons: 1). It interfaces with the present plan. 2). It provides access and has an economic impact for Timberline benefiting visitors of the valley. 3). We believe that networking between areas of the valley has educational value and promotes a balance between nature and commerce. 4). This particular trail has minimal negative biological impact. We feel this particular trail is very needed. Timberline Four Season Resort will take part in the maintenance plant.”

Response: The CCP only deals with that part of the Heart of the Highlands trail system that is on the refuge land. Therefore the Big Chain Ring Trail at Timberline Resort is outside of the scope of this document. The Heart of the Highlands trail system is being developed by a committee that includes management from the various public lands it encompasses and representation from Tucker County Trails. The commenter should bring up this concern with the committee.

Comment: A commenter wanted to see more access to the Middle Valley trails from the Beall Tract.

Response: The final CCP as well as Alternative B of the draft CCP/EA states that we will connect the Beall trails to the Middle Valley Trails and allow access for bicycle, horse, and pedestrians. For more information about these and other trail connections, refer to the final CCP, goal 4, objective 4.3

Comment: One person said that White Grass skiers should be required not just encouraged to stay on trails. White Grass skiers could be required, rather than encouraged, to stay on designated trails. These skiers benefit from the use of Refuge lands and should be cognizant of their responsibility to behave appropriately.

Response: We agree that the language regarding off-trail skiing should be stronger. In the final CCP, we will change this wording to state that additional trail signage will “ensure” that skiers stay on designated trails.

Comment: Some respondents were concerned that specific trails would damage sensitive areas. For example one respondent wrote: “The proposed trail from the swinging bridge to Cortland Road, if built, should be routed with caution to avoid traversing wetlands. The “alternate route” shown on Map 3-5 clearly traverses a number of sensitive wetlands, and is not a suitable route. Constructing a new trail through currently unfragmented wetlands would introduce hydrologic disturbance, soil disturbance, create a vector for invasive species, and disturb sensitive wildlife. This would be in direct conflict with the mandate to improve biological integrity, diversity, and environmental health of the wetlands.

Response: We agree that the construction of a trail from Swinging Bridge to Cortland Road will have some impacts, as described in Chapter 4, “Environmental Consequences,” of the draft CCP/EA. As stated in our first response in this section (Section 8.12, “Specific Trails, Roads or Areas”), we will need to conduct additional NEPA analysis on this action because we need to solicit additional public input on the exact route for this trail. This additional NEPA analysis will also include a more detailed analysis of the trail’s impacts to the refuge’s biological resources, among other things.

Comment: Constructing a trail from the Visitor Center to the Canaan Valley State Park would necessitate building a bridge over the Blackwater River and an extensive boardwalk over sensitive wetlands on either Refuge land or State park land. This proposal could be less damaging to the wetlands if the trail stays as close as possible to Rt. 32, possibly including planting of a narrow shrub/forest corridor between the road and the trail to improve the visitor experience. This is similar to the routing of rail trails, which typically parallel the road, and are very popular with recreational users. Creating a cross-valley trail would permanently disturb some of the most sensitive wetlands on the Refuge, and appears incompatible with the mission of the Refuge.”

Response: Before we implement this action of constructing a trail from the Visitor Center to the State Park, we will need to conduct additional NEPA analysis that will include public involvement and a more in-depth look at impacts to biological resources. We will take this comment into consideration as we engage in the next stages of that process.

We agree that creating a cross-valley trail would permanently disturb some of the most sensitive wetlands on the refuge. For this reason, we did not include this action in the Service-preferred alternative of the draft CCP/EA, nor did we include this action in the final CCP.

Comment: Several people were opposed to any specific trails proposed through wetlands.

Response: Comment noted.

Comment: One person asked the refuge to open up the Beall gate to hunter’s vehicles.

Response: The final CCP as well as Alternative B of the draft CCP/EA states that we will open the Beall gate to allow hunters access to North Beall Road by licensed vehicle (only cars and trucks, no ATVs). For more information on this action see goal 4, objective 4.3

8.13 Overnight Parking

(Letter ID#: 35, 54, 57, 181)

Comment: Four people asked the refuge to allow overnight parking at the end of old Route 80.

Response: The final CCP as well as Alternative B of the draft CCP/EA states that we will allow overnight parking by special use permit on Forest Road 80 for visitors accessing and camping in Dolly Sods. Camping on the road or anywhere on the refuge is prohibited. Permits must be acquired from the refuge office in advance. To request a special use permit, contact the refuge by phone, fax, e-mail or mail.

8.14 Shuttle Service

(Letter ID#: 39, 57, 59, 74, 75, 98, 114, 118, 140, 142, 159, 165, 175, 182, 183, 193, 207, 209)

Comment: One person suggested a tram system be established within the refuge and another suggested a train or something similar. A couple folks thought a shuttle service for the elderly and disabled would be beneficial. Another person suggested utilizing the old railroad grades for a shuttle service.

Response: We understand the desire to provide universal access to the refuge. However, there are several reasons why we will not consider this proposal at this time. First, the cost to build and run a shuttle system would be prohibitive because the old railroad grades have deteriorated over time. Second, we feel this use would not be consistent with the goals and objectives of the CCP because it would not offer a high quality experience for wildlife-dependent recreation. Finally, we feel this type of use would have unacceptable impacts on the refuge's biological resources due to the potential scope of the construction and the nature of the activity. The refuge does, however, provide universal access on Freeland Trail, on the Timberline Road fishing pier, and at hunt blinds, by reservation. Furthermore, the final CCP states that the refuge will work with the West Virginia Department of Highways to build and maintain an accessible road and overlook at Camp 70.

Comment: Three people did not support a shuttle service to aid hunters.

Response: Comment noted.

8.15 Off-Trail Access

(Letter ID#: 57, 59, 74, 75, 114, 118, 140, 142, 165, 175, 182, 183, 207, 209)

Comment: Fifteen people commented on off trail access. Most of these wanted the refuge to allow off trail access. A representative comment states, "Allow off-trail pedestrian access for non-hunters (by foot and/or cross-country skis and snowshoes) within the same seasons – except spring turkey season and perhaps the first three days of deer rifle season - and areas as hunters are allowed this access to facilitate the priority uses of wildlife observation and photography. Most of the same justification used for hunting (page B-38) would be applicable to pedestrian use for Wildlife Photography & Observation – including providing the opportunity to actually view wildlife more readily than you can from a trail. Just as hunting would not be an effective tool if only conducted from a designated trail because of limited encounters with the wildlife, so is observation and photography limited in the same way. Do not offer this in such a limited and restricted fashion that is not supported by process and science and creates a non-user friendly and an inconvenient, staff intensive permitting and regulating process. Off-trail access will be self-limiting as most people prefer the reassurance of being on a trail and do not want to bushwhack or tromp through wetlands, nor do most people want to break trail through deep snow. It will allow opportunity for users of all levels of ability and interest." Several respondents agreed that off trail use should be with a permit system, but one person expressed that off trail access should be allowed without any permitting process.

Response: Although we proposed in alternative C of the draft CCP/EA to allow limited off-trail access, we did not include this proposal in the final CCP. We understand the argument that off-trail access would enhance wildlife observation and photography just as it enhances hunting. However, we believe we could not offer a high-quality hunting experience without offering off-trail access, whereas we can, and do still offer a high-quality wildlife observation and photography experience without off-trail access.

Comment: One person did not want the refuge to allow off trail use and said, "You cannot believe the change that has taken place and I know you are aware of it because we talk it all the time. What is going to happen though in the next 50 years will determine at the end whether we did the right thing in our planning. It's one of those hindsight things so we better get it right. The thing that

I have seen changed is, of course, the numbers of people, the numbers of activities. These are... these can be very bad, it can be negative on that place. It's sensitive to the point that there are scars up there yet where the Army used it, you can still find them, so it's a very sensitive area. In other words, you want to have people go up there where you can control is what I'm getting at. A hunter going through the woods is not like a mass of people. It's just some type of control. If you run a trail through there, it needs to be...hey you stay on the trail because if you start letting them go right and left and go on (inaudible-mumbled) a negative thing."

Response: Comment noted.

Comment: One person wanted to see the science behind allowing Sunday off trail permits: "I think this is Alternative C, the reference to the Sunday off-trail use and it's recommended that 25 permits per month will be released for Sunday off-trail use during the hunting season. Is there any science or process that backs up how that suggestion came about and if so, where in the 600 pages is it?"

Response: The proposal to permit a limited number of off trail users per month was developed as a number which the refuge staff felt was reasonable to accommodate the use as well as to define a number with which to measure change. We felt that defining the number at 25 could be found appropriate and compatible based on refuge policy which includes not only impacts to refuge resources but also other priority public uses and visitor safety. We chose 25 permits per month to start with because it averages out to a little less than one person per day over a month-long period, and we felt this would be the highest level of off-trail wildlife disturbance that we would tolerate on the refuge. Defining a maximum number of visitors using the resource is not uncommon. The U.S. Forest Service defines an average group size of 12-15 in wilderness areas that allow horses. Similarly on West Virginia Division of Natural Resources Wildlife Management Areas, group sizes are limited to 25 and those on bicycles and horses in groups larger than 10 are required to get a permit. These rules are generally created to protect wildlife and reduce user conflicts. There is a body of literature on the effects of humans to wildlife and many specific studies which compare the impacts of on vs. off trail use. Please refer to the draft CCP/EA, Chapter 4, "Impacts that would not vary by alternative; Impacts to Wildlife," and also "Impacts of Alternative C," where we address off trail use specifically. Because of our concerns with increasing disturbance to wildlife, the potential of increased user conflicts creating decreased quality of experiences, and the fact that off trail use is permitted on all public land surrounding the refuge, this proposal was not included in the preferred alternative of the draft CCP/EA, or in the final CCP.

8.2 Hunting

(Letter ID#: 5, 7, 9, 10, 11, 12, 15, 16, 18, 19, 20, 23, 25, 26, 39, 41, 46, 48, 53, 66, 95, 98, 104, 108, 115, 119, 131, 139, 141, 143, 162, 175, 197, 207, 208)

Comment: There were about 44 general comments concerning hunting. Most of these wanted the refuge to allow hunting and encourage its continued use. For example a representative comment says, "I represent the 46th Delegate District which is all Tucker and the southern half of Preston County and my reason for signing up is basically, I have gotten some correspondence in the mail and also some emails in reference to the proposed plans. I do have some questions I would like to ask, is that going to be permitted when I make a statement?The questions relate to basically the emphasis of the individuals who contacted me. Most of these guys have contacted me mainly because they knew my background as a hunter. I'm very... been a very avid hunter all my life and they know where I stand when it comes to that aspect of sports (inaudible-mumbled). A lot of these guys have used the refuge long before you guys got here back when they had cabins and (inaudible) and basically what they are saying is that they are not in favor of any plan that is going to do away with what is currently available in terms of hunting at the refuge and if you look at Alternative B, it looks like that might be an increase in their ability to be able to hunt and the emphasis that they give to me is, you know, under no circumstances would they like to give up what currently is in place and they would be adamantly in favor of the expansion of the opportunity to be able to continue to hunt in the refuge."

Response: Comment noted.

Comment: Several respondents wanted to ensure that hunting with rifles not be allowed near private residences. One person wrote that shrinking the rifle zones was a good thing. Also several respondents want the refuge to prohibit hunting in certain areas of the refuge: “Hunting: Public access trails should specifically be listed and managed as an “other place where people gather for pleasure” and hence it should be illegal to shoot a firearm within 400 or 500 feet of trails.” It was also suggested that the refuge educate non-hunters [about] hunting presence on the refuge and its benefits as a management tool. Another person wrote, “Additional rifle areas are not required. Today’s muzzleloaders and sabot slugs are effective to 150 yards and sometimes 200 yards. Adding additional rifle areas is not required to harvest more deer.”

Response: As stated in the draft CCP/EA and the final CCP, we will modify “no rifle hunting zones” to open additional refuge lands to rifle hunting (see goal 4, objective 4.1). Many of these “no rifle hunting zones” were established to ensure safety during the hunt season. However, we believe that State regulations are adequate for ensuring safety and we see no reason to impose additional safety regulations on hunters. For more details on State safety regulations, refer to the compatibility determination for public hunting in appendix B of the final CCP.

Comment: One person thought hunting on the refuge should be controlled by a lottery system. Two people thought there should be more hunting blinds built rather than use a lottery system to access the two current blinds.

Response: Currently, the refuge is large enough to support all requests for hunting. Therefore, we do not need to implement a lottery system for hunt permits. We can generally accommodate all requests for the hunt blinds except during opening week for firearms season, during which time we implement a lottery system. However, if demand for these blinds increases we will consider building additional hunt blinds in the future.

Comment: A pro-hunting commenter wanting to protect sensitive species wrote, “Hunting is an excellent tool for managing populations of game animals. Special off-trail access to refuge lands is warranted to achieve those management objectives. Hunting should not be allowed for species that are rare or of concern for populations in decline or depressed.”

Response: Although we proposed in alternative D of the draft CCP/EA to remove from the hunt list some species that are rarely seen on the refuge, this proposal was not included in the final CCP. Regulations for species considered rare, such as Wilson’s snipe and Virginia rail, are made by the U.S. Fish and Wildlife Service on a flyway level and from a population management standpoint. As such, hunting of those species on the refuge is not likely to significantly affect regional or national populations. While we understand the desire of some members of the public to remove these species from the hunt list or to prevent off-trail access which would facilitate the hunting of these species, there is no scientific evidence that permitting this type of use materially affects the local or flyway populations of these rarely seen species. In addition, refuge hunt surveys submitted for the past five or six years have documented only about a half-dozen snipe or rail taken from refuge lands.

Comment: Several people disagreed with hunting as a management tool. One person stated, “..... the philosophical change to the mission of Fish and Wildlife is wrong, allowing hunting, trapping, and kill assistance within the refuge is wrong...”

Response: Hunting is one of the six priority public uses to receive enhanced consideration on national wildlife refuges, according to the 1997 Refuge Improvement Act (Public Law 105-57; 111 Stat. 1253), which amended the National Wildlife Refuge Administration Act of 1966 (16 U.S.C. 668dd-668ee). The Service strongly encourages refuge managers to provide visitors quality hunting opportunities when and where hunting is compatible with refuge purposes and the mission of the National Wildlife Refuge System. We have found hunting to be compatible at Canaan Valley National Wildlife Refuge and therefore we will continue to allow it.

Comment: A commenter wrote concerning the Freeland Tract: “My suggestion for the Freeland Tract hunting closure is to close only the open area surrounding the boardwalk. My main concern is that the hawthorn and woods area to the northeast of the open field area (containing the boardwalk) be left in huntable area. This portion of the Freeland Tract contains good early successional habitat and woods that could easily be converted to such habitat and should be left available to hunters. If I’m not mistaken, this area also contains a handicapped accessible hunting blind. If this area is open for “special deer hunts”, it should also be available for other forms of hunting.” Another stated, “ I am oppose to closing of the Freeland Tract to hunting (except deer), fishing, or walking dogs. Much hunting occurs from November through February when most other uses have greatly declined. This proposal would decrease recreation use when user conflicts would be minimal. (perhaps only hunters, fishermen should be allowed on public hunting lands -- banning all other public would minimize user conflicts, avoid disturbance of game, create less disturbance of other wildlife, etc. !! See where I’m coming from? Let’s all try to live together!) I would recommend that blaze orange be required for all visitors on refuge lands during hunting seasons for safety reasons. (Pennsylvania has this requirement on their game lands.)”

Response: As stated in our fifth response under section 8.12, “Specific Trails, Roads or Areas,” we will close the Freeland tract to public hunting, fishing, and walking with dogs, to promote a quality wildlife observation/education experience without other competing public uses. With the exception of a few closed areas near busy roads and populated areas, the entire 16,000-acre refuge is open to hunting. Furthermore, we permit dogs on more than 30 miles of trails and fishing is permitted on miles of river and stream habitats throughout the refuge and on neighboring conservation lands. In summary, we feel there are ample opportunities for hunting, fishing and dogwalking on the refuge, and prohibiting these public uses on the .4-mile Freeland Trail and on 76 acres of land on the Freeland Tract would not detract from these opportunities.

The accessible hunt blind is not located on the Freeland tract.

8.3 Upland Bird Hunting

There were no comments in this category. Some comments mentioned grouse and woodcock hunting, but their comments were about early successional forests.

8.4 Deer Hunting

(Letter ID: 13, 21, 41, 62, 81, 95, 97, 101, 140, 143, 176, 178, 180)

About 12 comments were directed toward deer hunting and all were in favor of increased deer hunting or in favor of hunting as a management tool to decrease the deer herd. One person asked the refuge to assist hunters with deer extraction, while one person asked how the refuge would implement assisting hunters with deer extraction. A couple others wanted to have increased rifle deer hunting. One person wanted a bow hunting only area and wrote, “I understand that controlling deer population is a high priority of the hunting aspect of the draft CCP. I agree with increased antlerless deer harvest but disagree with opening more areas to rifle hunting. As the plan says, every hunter has a different opinion of what makes a good hunting experience. I would like to see at least one area turned to a bow hunting only area, this would provide bow hunters with a quiet place to hunt and provide non-hunters an area to recreate without worrying about rifle shots and contribute to the overall tranquility of the Refuge. Bow hunters often stop hunting during rifle season, so a bow only area would be a draw for bow hunters from throughout the State. Increased doe take could be facilitated by extra doe stamps for the refuge hunting areas rather than increasing rifle hunting areas.”

Response: We appreciate the support in our efforts to increase the deer harvest on the refuge. As stated in the draft CCP/EA and the final CCP, we will provide a shuttle system to help deer hunters with extraction. The purpose of the shuttle will be to transport bagged deer, not to transport people. For more details on the shuttle, see goal 4, objective 4.1

With regards to bow hunting, the refuge will continue to provide an archery-only hunt area on the refuge east of Route 32, adjacent to Black Bear Woods. Bow hunters can also hunt anywhere on the refuge during the State’s archery-only season, which begins before any of the other State deer seasons. We understand

that some bow hunters may prefer a more solitary experience, but we believe the State archery season and the refuge's archery-only hunt area are adequate for providing a quality archery hunting experience.

8.5 Raccoon Hunting

(Letter ID#: 13, 36, 53, 139, 175)

Comment: Two responses were against raccoon hunting. One such comment was against hunting raccoons and encouraged the refuge to gather supporting data stating, "Data should be collected on the impacts of night hunting for raccoons under all Alternatives. There is potential for damage to wetland habitats and sensitive wildlife that is disproportionate to the recreational experience gained by a few individuals." Three comments favored night raccoon hunting.

Response: We agree that habitat damage and wildlife disturbance can occur with night hunting. However, due to the low number of night hunters, we believe that this activity causes very little wildlife disturbance or habitat damage. As stated in the compatibility determination for hunting in appendix B of the final CCP, hunter survey information from the refuge indicates that from 2002 to 2005 a total of only 10 people hunted raccoon on the refuge.

8.6 Trapping

(Letter ID#: 13, 41, 60, 95, 175, 209)

Comments: Of the seven comments, two were for trapping of beaver and five were against trapping. An indicative comment against trapping stated, "The CCP seems to neglect the benefits of beavers. They provide early successional habitats in areas inaccessible to human management, and provide such habitat in riparian areas that are desirable for a number of wildlife species, including woodcock. I assume issuance of special use trapping permits are within State statutes." A pro-trapping commenter wrote, "Beaver trapping and control should be conducted by refuge staff or contractors if public trapping is insufficient for management goals. Since this management strategy protects the rarest wetland communities on the Refuge, it should be included in all Alternatives." The other pro-trapping comment stated that only the public should be allowed to trap, not staff or contractors.

Response: In the rationale for objective 1.2, under goal 1, we explain that beaver activity and the flooding of low lying areas is a natural and important disturbance process in Canaan Valley. With few natural predators, however, the beaver population threatens sensitive plant communities with prolonged inundation. Our actions related to beaver management in the final CCP are aimed at reducing the threat of inundation of rare plant communities by proactively trapping through a special use permit issued by the refuge. In the compatibility determination for public beaver trapping (see appendix B of the final CCP), we state that if public trapping does not resolve impacts to refuge resources, refuge personnel and/or refuge-appointed contractors will be assigned to remove problem animals.

8.7 Fishing

(Letter ID#: 21,101, 113, 175)

Comment: Three comments were pro-fishing and one wanted to know if fishing was addressed in the CCP.

Response: We appreciate the comments supporting fishing. Fishing is addressed in goal 4, objective 4.2 of the final CCP.

8.8 Multi-day Recreation

(Letter ID#: 13)

Comment: Two people stated that multi-day recreation on the refuge was not necessary as it is provided by other agencies and in other areas.

Response: Comment noted.

8.9 Dogs, Horses, Bicycles

(Letter ID#: 2, 13, 53, 54, 139, 141, 163, 167, 175, 195, 208)

Comment: One person wrote, “The impact of bicycle and horse use on Refuge lands should be carefully considered for all trails, especially those in the vicinity of limestone substrates or wetlands. Soil compaction, hydrologic alternation, drainage problems, erosion, and creating vectors for invasive species are typical concerns.” One person questioned designating unsuitable trails for biking: “I would further like to question the designation of trails for biking and hiking on routes that are not yet suitable for biking. It is difficult to understand why biking is allowed where it is clear that it is destructive and inconsistent with good trail maintenance. Once the trails are improved to support bike traffic designations can be expanded. I have raised this concern with NWR personnel and will continue to do so.” Another person suggested restricting bicycles because they cause erosion.

Response: We agree that bicycle and horse use can cause damage to refuge resources, as explained in chapter 4, “Environmental Consequences,” of the draft CCP/EA. We also agree that many of the trails that allow these uses are in need of maintenance to better support these public uses. However, bicycling and horseback riding provide easier and quicker access for many visitors who may not otherwise experience the refuge’s habitats and other resources. For this reason, we allow these uses but limit them to trails where they will have the least impact.

Comment: Several people were upset with the wording of “pursuit dogs” in the CCP. One such respondent wrote, “I have got a real problem here. It’s a minor one but it really bothers me and that’s the word ‘pursuit dogs’ and I am going to read this again and I’m talking about the derogatory nature of the comment ‘pursuit dogs’. I don’t want anyone to envision my English Setters or any other dog breed with horns of the devil baring large fangs while in pursuit of a grouse or woodcock. I suggest you use the term ‘hunting dogs’ instead of ‘pursuit dogs’. There is a sentence on page 50 under Impacts that is bothering. It reads, although some members of the public may consider the use of pursuit dogs inhumane, that issue is not commonly mentioned during public’s scoping. I am recommending that this entire sentence be stricken from the document if indeed it was mentioned in scoping, then there is a real need for mentioning it here, however, then I would like to see you strike the word ‘may’ and change ‘pursuit dogs’ to ‘hunting dogs’.”

Response: We agree that the words “pursuit dogs” are inflammatory and misrepresent the situation. We removed this wording from all hard copies of the draft CCP/EA and from the on-line version of the draft CCP/EA. We have also removed this wording from the final CCP.

Comment: Some people were against allowing hunting dogs on the refuge.

Response: Comment noted.

Comment: One person thought ATVs should not be allowed and felt that restrictions on horses were ok.

Response: All-terrain vehicles (ATVs) are not allowed on the refuge. Horses are restricted to designated trails.

9.0 Alternatives

9.1 General Comments on Alternatives

(Letter ID#: 13, 60, 63, 74, 75, 77, 79, 95, 131, 134, 175)

Comment: About 11 people had general comments concerning the alternatives and generally described parts and pieces of the various alternatives that they liked or disliked. For example: “The four Alternatives presented in the CCP are (A) Current Management, (B) Emphasis on Focal Species, (C) Emphasis on Expanding Priority Public Uses, and (D) Focus on Managing for Historic Habitats. Alternative A, the “no action” alternative, will not reduce the overpopulation of deer or increase ESH acres. Alternative D will allow forest structure to mature without consideration of the needs of USFWS focal species in decline that require shrublands and young forests for survival. For these reasons, WMI strongly opposes the adoption of Alternatives A and D.”

Response: Comment noted.

Comment: One person stated that CVNWR should not influence adjacent property owners: “CVNWR should not be involved with getting adjacent landowners to adopt the refuges management strategies. These landowners have the right to manage their land as they see fit within the law. They should not be subjected to pressure, or even personal contact, by refuge staff regarding their property management. Wildlife habitat management cooperation by individual landowners should be the responsibility of the WVDNR.”

Response: We agree that private landowners have the right to manage their property any way they want and the refuge should not pressure private landowner to manage their property in any particular way. However, the refuge is always willing to work with private landowners who are interested in managing their property in a way that would maximize opportunities for wildlife and wildlife habitats.

Comment: Several people wanted to know if the Alternatives were firm as separately stated or would the refuge adopt parts of each alternative into the final proposal. One such comment stated, “So it’s realistic to think that Alternative B can be the plan that is chosen but in its final form, it may be amended to include some piece that shows up in C or D or to exclude some piece that shows up in B if that’s what the public comments lead you to. Is that correct?Then I could have used X, Y and Z...Okay. So it’s not so much about either or’s as it is about shades of grey and prioritization and I think that’s what I’m hearing?”

Response: It is true that, based on public comments and other factors, we can take different parts of different alternatives from the draft CCP/EA and put them together to develop the final CCP.

Comment: One commenter wrote, “How much flexibility...once you decide on an alternative and you implement it...start implementing it, it’s a 15 year plan...how much flexibility do you have to make changes as things come up? You know you find a trail that may not be doing what it should be or it’s blocking something. You can make changes within... Okay, it’s like a guideline?Would you have public hearings or comments?”

Response: As stated in the final CCP, at the end of Chapter 2, periodic review of the CCP will be required to ensure that we are implementing management actions and are meeting the objectives. Ongoing monitoring and evaluation will be an important part of that process. Monitoring results or new information may indicate the need to change our strategies. We will follow the procedures in Service policy and the requirements of NEPA for modifying the CCP, its associated documents, and our management activities as needed.

9.2 Actions Common to All Alternatives

(Letter ID#: 86, 178)

Comment: One person asked if there was a table comparing all alternatives.

Response: Yes, there is such a table. Table 3.1, “Summary Comparison of Management Actions by Alternative,” is located in the draft CCP/EA at the end of Chapter 3.

9.3 Alternative A—Current Management (No Action)

(Letter ID#: 60, 134, 161, 166, 172, 185)

Comment: One person asked if Alternative A was the old Station Management Plan.

Response: Alternative A in the draft CCP/EA is not the old Station Management Plan. Instead, alternative A satisfies the National Environmental Policy Act (NEPA) requirement of a “no action” alternative, which we define as “continuing current management.” It describes our existing management priorities and activities, and serves as a baseline for comparing and contrasting alternatives B, C and D.

Comment: A person wrote that Alternative A should be adopted and available refuge funds should be sent to the Gulf of Mexico oil disaster cleanup.

Response: Comment noted.

Comment: Most people favoring Alternative A wanted to see enhanced wildlife security, while some did favor opportunities for wildlife observation and photography. Two people opposed Alternative A as being too restrictive. One such comment said, “I oppose Alternative ‘A’ in principle because I believe if you’re not moving forward you are going backward, there is no ‘stay the same’”. In my opinion, current refuge management policy was based on a “revolving door manager” system where basically the biologist determined what would happen and the manager agreed to it because the manager knew he/she would not be at CVNWR long enough to make a difference. I disagree with this style of management. The biologist works for the manager. The biologist suggests courses of action; the manager decides what actually is going to be done. I believe one purpose of the Draft CCP/EA is to MAKE PROGRESS in the management of the refuge for the next 15 years. If this is the case why would anyone support Alternative “A”.”

Response: These comments have been noted and factored into our decisions regarding the development of the final CCP.

9.4 Alternative B—Focal Species (Service Preferred Alternative)

(Letter ID#: 2, 17, 21, 24, 25, 34, 36, 42, 44, 50, 54, 58, 60, 65, 67, 97, 98, 125, 161, 165, 166, 168, 170, 172, 178, 184, 185, 190, 195, 205)

Comment: Thirty-two comments referred to Alternative B. One person wanted to know what methodology was used to identify focal species.

Response: The process for establishing focal species is explained in appendix E of the final CCP.

Comment: One person stated that allowing increased access for hunting and fishing was a “carrot” dangled to entice the public to agree with the alternative. They stated, “The following are comments specific to the other proposed Alternatives. Alternative B is the preferred alternative listed in the Executive Summary.

The proposed additional access to deer hunting and fishing makes this option look attractive to the local population and to the tourist population, but in reality few locals hunt on the refuge because of the popularity of the local hunt clubs and few tourists hunt on the refuge because the average tourist wants to see and photograph the local wildlife and fauna rather than kill it. Therefore, additional hunting is really only a carrot to dangle and is not a solid justification for the additional resources that would be needed to fund the additional staffing and programs called for by this alternative.”

Response: We respectfully disagree with this comment. During the public scoping process, and since the refuge has been created, hunters and anglers have long asked for increased access to the refuge. Therefore, it was our obligation to address this issue in the CCP. Furthermore, proposals for additional staffing and funding are not solely tied to increased hunting and fishing opportunities. Rather, additional staff is needed to help support enhanced environmental education programs and to an enhanced habitat management program.

Comment: Many people supported Alternative B because it focused on wildlife. For example a respondent wrote, “As a bird watcher and regular visitor to the refuge, I support the adoption of Alternative B to the CCP for the refuge. Focal species management by forest type combined with control of the growing deer herd would best help to achieve effective management practices.” The Nature Conservancy and Pennsylvania Game Commission supported Alternative B.

Response: We appreciate the support for alternative B, the Service-preferred alternative from the draft CCP/EA.

Comment: The West Virginia Division of Natural Resources Wildlife Resources Section appreciated the refuge’s work and process, but disagreed with refuge habitat management strategy: “The Wildlife Resources Section (WRS) of the West Virginia Division of Natural Resources (DNR) appreciates the time, effort and resources invested by the U.S. Fish and Wildlife Service (Service) in preparing the draft Comprehensive Conservation Plan (CCP). Recognizing the importance of this Refuge to West Virginia’s sportsmen and women and other outdoor recreationists, the Director of the DNR and Chief of the WRS dedicated staff time to support the Refuge throughout the entire CCP process. In addition to the numerous Core Team and public input meetings, stakeholder group exercises, subject specific focal group discussions with outside experts and the seven public comment meetings, WRS has been an active participant and supporter of the Service and this Refuge. While we recognize that this refuge is not a wildlife management area, we still believe that the habitat management priority and emphasis identified in the Preferred Alternative (B) is insufficient and somewhat misguided and we cannot provide complete concurrence with this alternative. Because the acreages proposed for management are almost identical across alternatives (Table 1), we are compelled to focus on management priorities.” This comment letter by WVDNR goes on to say that since “the refuge is essentially surrounded by spruce forest, our belief [is] that this area’s uniqueness is due to the early successional shrub component and expansive wetlands.” As such, WVDNR asks the refuge to place less emphasis on activities such as spruce forest restoration.

Response: After receiving these and other comments from WVDNR, we met with our colleagues from WVDNR to discuss their comments. On the issue of spruce forest restoration, the refuge agrees that in some areas spruce forest is reseeding naturally, but we believe that active restoration is important to accelerate the reestablishment of this forest type in appropriate areas on the refuge, especially where adequate seed sources do not exist. The WV Wildlife Action Plan also identifies spruce forest as a community type of management concern and along with it a host of wildlife species tied to these communities, including the threatened Cheat Mountain salamander, which are both State and Federal priorities for conservation. The view of spruce restoration’s importance within the Central Appalachian region is shared and supported by a multi-agency organization which includes representation from WVDNR. While the refuge understands the uniqueness of the shrubland and other early successional habitat in the Valley, we believe that management actions to support red spruce restoration do not detract from these other habitat values. In addition, working to restore historic habitats helps the refuge meet the Service’s Biological Integrity, Diversity and Environmental Health policy (601 FW 3). The refuge also must evaluate its contribution of habitats on a landscape scale and working to improve and restore spruce forest habitat on the refuge will help achieve larger goals within the State and ultimately within the Appalachian Landscape Conservation Cooperative.

Comment: Some people objected to Alternative B stating, “I am not in agreement with Alternative B, which has been identified as the Refuge preferred Alternative. I am not in favor of increased access for deer hunters, nor do I support efforts to reduce the deer population from the refuge. What I have noticed in the past 5 years is a significant decrease in the deer population already, and frankly speaking, that is why I love to go to Canaan Valley and spend time in my vacation home – to see the wildlife and enjoy their presence. WV already offers a tremendous abundance of hunting land, and I am not in favor of giving increased access to more hunters in the Canaan Valley.”

Response: According to WVDNR officials, deer densities based on number of bucks killed per square mile differ and range from 17 to over 30 on refuge lands between 2002 and 2006. Surveys conducted in the Timberline Homeowners development by the WVDNR estimated 46 deer per square mile in 2003 and 59 deer per square mile in 2004. Current management of deer in Tucker County targets a density of 25-30 per square mile (Taylor 2009). Refuge observations and forest inventory data suggest that current deer densities are affecting balsam fir survival and impacting forest understory development. Managing the deer population to maintain species diversity and natural processes is an integral component of maintaining the health of the refuge’s wetland complex.

Comment: And another person wrote, “Although the NWS prefers Plan B, we do not believe Plan B is in the best interest of this property, because it states: “we would increase opportunities for wildlife-dependent recreational uses by, for example, promoting trail connectivity and offering more programming. Funding and staffing would increase to support enhanced . . . public use programs.” The reason we object to this option is because we believe promoting trail connectivity would result in overuse and damage to sensitive wildlife habitats, and would increase use by some who are inappropriate users. As it stands, trail maintenance and trail marking in CVNWR are minimal, at best, and deserve sensitive upgrades for sustainability and to assist pedestrian access through the refuge. More trail connectivity would likely attract inappropriate use by mountain bikers and ATV riders, which are currently not permitted in this refuge.”

Response: The National Wildlife Refuge System Improvement Act defines wildlife observation, photography, environmental education, and interpretation as priority public uses that, if compatible, are to receive our enhanced consideration over other general public uses. Permitting these uses provides opportunities for the public to enjoy wildlife and plants on the refuge in accordance with the law, and produces better-informed public advocates for Service programs. Providing trail connectivity facilitates many of these uses.

We agree that there are some impacts associated with public use, such as trampling vegetation and disturbance to wildlife near trails. However, stipulations to ensure compatibility will make these impacts minimal. For example, by limiting bicycling and other uses to designated trails, disturbance will be limited and manageable. For more information on how public uses are compatible with refuge purposes, see the compatibility determinations in appendix B of the final CCP.

We also agree there is a possibility that trail connections create more opportunities for illegal activities such as ATVs. The refuge’s law enforcement officer and other refuge staff will remain vigilant for these illegal activities and will prosecute violators to the fullest extent of the law.

9.5 Alternative C—Emphasis on Expanding Priority Public Uses

(Letter ID#: 8, 13, 60, 67, 132, 161, 166, 184, 185, 192)

Comment: Ten comments referred to this alternative. Most commenters stated that this alternative would have detrimental impacts on wildlife. For example one person wrote, “It is clear from this table that Alternative C has the most negative impacts and the fewest benefits for almost every factor assessed, including air quality, hydrology, water quality, soils, upland forests, freshwater habitats, all wetlands, fisheries, and T&E species. Given that Alternative C is the only Alternative that threatens to have major cumulative negative impacts (4-84), it is logical to remove this Alternative from consideration.” Another person thought Alternative C would require substantial additional resources, writing: “Alternative C is objectionable because like Alternative B it will require substantial additional

resources and will also be the most invasive to the current natural state of the Wildlife Refuge. There is no justification for adding or subtracting trails, or old roads or railroad grades. Indeed this would cause the most disturbances to the current natural environment.”

Response: Comments noted.

Comment: Those in favor of this alternative supported increased public access, for example stating, “Alternative C has more public access and that should be considered as well.” A respondent also wrote, “I would be most supportive of Alternative “C” with the following specific changes, in addition to any other applicable comments above: Maintain the current level of invasive species monitoring and control. Red Spruce planting by volunteers only, with no refuge support other than site selection. No additional construction of deer exclosures. Increase the number of public trails in spruce forest since trails limit disturbance. No Special Use Permit required to hunt rabbits on the refuge. Specific inclusion of a trail to be constructed between the Camp 70 area and Cortland Road nearest the Beall Tract. No off trail Special Use Permit requirement. Construction of the Environmental Education Pavilion on the Beall Tract. Absolutely no use changes for the Freeland Tract that would limit the experience for any pedestrian type of use be it hunting, fishing, bird watching, dog walking on a leash, ETC.”

Response: We appreciate these specific comments related to this alternative. Based on this and other comments we received on the draft CCP/EA, we have modified alternative B from the draft document by including some strategies that were proposed in alternative C. For the full list of management actions, see chapter 4 of the final CCP.

9.6 Alternative D—Focus on Managing Historical Habitats

(Letter ID#: 13, 161, 172, 184, 185)

Comment: Five comments were received concerning Alternative D. Some respondents favored this alternative feeling it had the fewest negative impacts. A person wrote, “Alternative D has the fewest negatives impacts and the most benefits for these factors, and the preferred Alternative B is intermediate. I strongly favor Alternative D as providing the greatest benefits to the public in terms of responsible stewardship of globally significant habitats, T&E species, State species of concern, water quality, and air quality.”

Some respondents appreciated some aspects of this alternative, but questioned other aspects. For example a respondent wrote, “Alternative D calls for limited disturbance of already-disturbed areas, however; it would actively manipulate what is now a natural state and [it] would seek to accelerate the aging process [and it] would create an unnatural state in what is supposed to be a natural environment. Alternative D would also require additional resources. In conclusion, I do not believe that the expenditure of additional funds to maintain this National Wildlife Refuge is fiscally reasonable or justifiable.”

Response: These and other comments regarding this alternative have been considered and evaluated in regards to the management direction discussed in the final CCP.

Comment: One person thought this alternative was too restrictive in its public use. Another felt Alternative D would be inappropriate in allowing mature forest to eventually dominate: “We strongly believe that an emphasis on development of mature forest conditions throughout the refuge is inappropriate for Canaan Valley NWR given the Service’s mission and Canaan Valley’s landscape context. Mature forest habitat is generally increasing in the Appalachians, and a relatively small proportion of mature forest wildlife species are of conservation concern. In contrast, grassland and early successional habitats, along with a large proportion of the wildlife species that depend on them, have declined precipitously in recent decades. As noted in the CCP, implementation of Alternative D would result in the eventual disappearance of these species from the refuge. Mature forest habitats are already well-established in the Allegheny Mountains, and approximately 10 percent of the adjacent Monongahela National Forest is set aside as wilderness, providing large acreages that will essentially be managed “hands off” as mature forest in perpetuity. The limited value that would accrue to the region’s wildlife

from additional mature forest acreage on the refuge is far outweighed by the benefits of a more active management regime, with an emphasis on early successional species. We agree that there is value in maintaining older forest on certain areas of the refuge for some focal species, and note that Alternative B includes management actions to address this need.”

Response: We agree that shrub management is a priority for the refuge, but that shrub management does not preclude managing for other habitat types. We also agree that alternative B from the draft CCP/EA offers a reasonable balance between managing priority shrub habitats and ensuring the ecological integrity of the refuge’s mature forested habitats.

9.7 Research Natural Area

(Letter ID#: 13, 60, 101, 162, 175, 195, 208)

Comment: Six comments were in favor of a research natural area. One such comment stated, “The establishment of a Research Natural Area is highly appropriate within the CVNWR. Botanical Research Areas exist on Federal land in similar settings at twenty-seven locations in the Monongahela National Forest, including such areas as Bear Rocks bog, Fisher Spring Run bog, Big Run bog, and Cranberry Glades. The wetlands of Canaan Valley are significant natural areas with biodiversity value to the nation, and would benefit from this additional study and protection.”

Response: We appreciate the support for the Research Natural Area.

Comment: One person suggested reducing the size of the research natural area to 593 acres.

Response: Alternative C in the draft CCP/EA proposed to create a 593-acre Research Natural Area (RNA), while alternative B proposed to create a 754-acre RNA. We proposed the smaller RNA in alternative C because we predicted it might have less of an impact on hunting. Except for deer hunting and beaver trapping, all other hunting is prohibited in the RNA. However, upon further analysis, we realized that most of the shrubland habitat within the larger RNA exists as either narrow bands (alder) or scattered shrubs within a saturated moss-dominated or emergent wetland. Therefore the habitat suitability for hunted species such as American woodcock is low and the designation will have little effect on the hunter opportunity for game species. We chose to include the larger acreage in the final CCP because it was a more ecologically cohesive unit and it would make a larger area available for this important designation.

Comment: One comment was against establishing a research natural area: “We strongly disagree with the proposal to establish a 754 acre Research Natural Area. 754 acres is about 14 percent of the 5,370 acres of wetlands within the refuge. While we are in agreement that research is important, (especially for our colleges and universities), there are volumes of research findings available to these institutions. In our Lake states for example (Michigan, Wisconsin and Minnesota) are hundreds of thousands of acres of wetlands and bogs. The universities of these states have conducted years of research on these areas. I believe that some of these projects are ongoing. It is only a few hours travel to Michigan and Wisconsin for participation in research.”

Response: We agree that there are many resources available for locating different types of biological research. However, the purpose for the creation of this RNA is to study this particular area, which constitutes a prime example of high elevation/Central Appalachian wetland plant communities. As a component of the largest wetland complex in the State of West Virginia as well as containing the largest contiguous peatland and shrub swamp plant communities, the specific area designated for this RNA meets the criteria of an ecological community that illustrates characteristics of a physiographic province or biome. Research on these types of ecological communities is not readily available, and the refuge would like to be a part of contributing to whatever research exists.

9.8 New Alternatives Proposed by the Public

There were no comments in this category.

9.9 Cumulative Effects

(Letter ID#: 13)

Comment: One comment stated that the refuge needs to take into account what is happening around it and said, “In managing for biological integrity, diversity, and environmental health, it is important to take into account the landscape context of the Refuge. This is particularly important in terms of management for early successional landscapes. The needs of the many species that benefit from this type of habitat must be balanced with the needs of species that require forest interior habitat. At CVNWR, the surrounding landscape is a mosaic of forested, early successional, and developed land. It includes large areas of public land, which provide relatively unfragmented and often forested landscapes. However, the State parks also include managed recreational landscapes (golf course, mowed areas, constructed facilities, roads, trails) and early successional landscapes, both managed and natural. The Monongahela National Forest on Dolly Sods includes forest and natural open wetland herbaceous and shrub communities, along with areas of early successional grassland and shrubland which are in very slow recovery from past logging, burning and grazing disturbance. There are also large tracts of private land that border the Refuge. These private lands are largely non-forested or highly fragmented, including strip mines, agricultural areas, and ski slopes. Finally, pipeline and powerline rights-of-way provide early successional habitat and also forest fragmentation. All of these adjacent fragmented or early successional landscapes, in addition to the relatively unfragmented national forest lands, should be considered in developing the land management goals on the refuge. The refuge does not exist in isolation, and the trust species using the refuge habitats will not know where the boundaries are.”

Response: We agree that it is important to consider the refuge “in context” when developing land management goals. For example, we recognize that the refuge plays a particularly important role in providing early successional habitat because the refuge is surrounded by a sea of mature forest. Also, we recognize that grassland habitat on the refuge that lies adjacent to privately owned grassland habitats provide the most valuable grassland habitats in the area because together, they are of large enough size to support breeding grassland bird populations. Through these and other examples, we show that we do, indeed, consider the larger landscape when we develop land management plans.

9.10 Wilderness Review

(Letter ID#: 175, 60)

Comment: Two comments were received; both were opposed to wilderness designation in the refuge. One stated that no portion of the refuge should be designated as wilderness. The other thought some of the refuge area qualified: “The Wilderness Review completed for the CCP found two (the text on page 3-16 said 1 area, and the chart beginning on page C-5 shows 2 areas) areas of the refuge that complied with the criteria for inclusion as wilderness areas, but for other reasons would not be designated as such at this time. After reviewing the criteria in the table beginning on page C-5, it is my opinion that none of CVNWR qualifies as wilderness area. The history of the area tells us that Canaan Valley is in its present environmental condition due largely to the influence of man. Canaan Valley has been farmed, timbered, hunted, trapped, fished, gas and power line traversed, ATV abused, and recreationally and commercially used in many other ways for generations. The footprint of man is undeniably and irretrievably visible in every area of the valley. There is no way it should be realistically considered for wilderness designation. This evaluation should be reconsidered from a purely scientific point of view, not from a personal opinion of the beauty and diversity of the area, and reversed.”

Response: As stated in appendix C of the final CCP, after conducting the inventory phase of the wilderness review process, we have determined that Wilderness Inventory Areas (WIAs) 7 and 10 qualify as Wilderness Study Areas. However, we have decided that we cannot complete the wilderness review process at this time, but instead will complete it within 3 years of approval of the final CCP. During the review process, we may find, as the above comment suggests, that the two WIAs are not suitable for wilderness designation. However, this determination cannot be made until the review process is complete.

Attachment 1. Letter Identification.

Letter Number	First Name	Last Name
1	Dennis	Labare
2	Charlie	Nichols
3	Richard F.	Horan
4	Not Given	Not Given
5	Robert	Fanning
6	Lee & Brenda	Miller
7	Robert L.	Fischer
8	Ron	Avlestock
9	Doug	Yanak
10	Willis	Bentley
11	Karl	Petro
12	Charles G.	Hunter
13	Elizabeth	Byers
14	Allan	Phillips
15	Michael E.	Gushue
16	Ellen	Not Given
17	Gregory L.	Whitt
18	Stephen	Feagans
19	Carroll T.	Allen
20	James	Rea
21	Eileen & Stanley	Smith
22	Eileen & Stanley	Smith
23	Rick & Linda	Layser
24	Karen	Mueller
25	Chuck L.	Strickland
26	John R.	Bonham
27	Peter	Shoenfeld
28	Cindy	Phillips
29	Dave	Leshner
30	Roger	Lilly
31	Julie	Dzaack
32	Ken	Dzaack
33	John M.	Chapman
34	Michael B.	Harmon
35	Jim	Kirk
36	Jeff	Beardmore
37	Peter	Shoenfeld
38	Dave	Truban
39	Chris	Moyer

Letter Number	First Name	Last Name
42	Bob	Beabin
43	Not Given	Not Given
44	Judy & David	Bitting
45	J. R.	Nolan
46	Stanley E.	Shaver
47	Bruce	Dalton
48	Mike	Snyder
49	Jeanne Jeane	Odom
50	Timothy J.	Heater
51	Joe	Manchin III
52	Rodger	Lundell
53	Walter	Lesser
54	Jim & Barbara	Smith
55	Eileen & Stanley	Smith
56	Bruce	Wilson
57	Mary Ann	Honcharik
58	Carol	Schimpff
59	Roger	Lilly
60	Ken	Dzaack
61	Mike	Dant
62	Ron & Deb	Dolly
63	Scott James	Williamson
64	Leon	Johnson
65	Bruce	Tenney
66	Dick	Wilson
67	Keith	Strausbaugh
68	Merrill	Warden
69	Carol	Schiff
70	Tommy	Zikes
71	Inaudible	Inaudible
72	Steve	Schim
73	Honey	Snyder
74	Julie	Zach
75	Skip	Stemle
76	J.R.	Nolan
77	Ben	Herrick
78	Pete	France
79	Bobby	Snyder
80	Mona	Woods
81	John	Merrifield
83	Randy	Reed

Letter Number	First Name	Last Name
84	Merrill	Whittaker
85	Inaudible	Inaudible
86	Thomas	Wood
87	Robin	Cable
88	Keith	Kran
89	Rita	Haverty
90	Inaudible	Inaudible
91	Inaudible	Inaudible
92	Melodie & Lane	Jones
92	Kathryn H.	Ortt
92	Jim & Jean	Odom
92	John & Leah	Cooper
92	Lee	Miller
92	Brenda	Miller
92	Joel	Foster
92	Wade K.	Miller
92	Stephen	Haid
92	Alicia	McCormick
92	George F.	Lynch Jr.
92	Doug & Myra	Martin
92	Bruce & Geraldine	Wilson
92	Patricia	Snow
92	Stephen K.W.	Chock
92	Elaine M.	Chock
92	Joe	Massi
92	Sara	Massi
92	Michael W.	Chapman
92	Yvonne	Chapman
92	Helen Manos	Lynch
92	Joh H. & Debbie	Brown
93	Murry	Deerborn
93	Margaret	Collom
93	Jeff	McLaughlin
93	Richard F.	Horan
93	Aila M.	Casielma
93	Karen	New
93	Freda & Carney	Ratliff
93	Glenda	Crawford
93	W. D.	Runyon
93	Jonathan	Collom
93	Sadie	Johnson

Letter Number	First Name	Last Name
93	Jay & Heidi	Hamric
93	David	Smigal
93	Becky	Smigal
93	Janice H.	McCarthy
93	Donald O.	Schultz
93	Carolyn H.	Schultz
93	Mike & Christi	Dant
93	Joyce	Runyon
93	John A.	Moulds
93	Charles & Judith	Sturtz
93	Dan & Lisa	Gillogly
93	Kim	McLaughlin
93	Cathryn	Deerborn
93	Tom	Vogel
93	Paul N.	Silvestri
93	Bethany A.	Good
93	Jean E.	Moulds
93	Janet	James
93	Kathleen M.	Snider
93	Frederick W.	Fisher
93	John M. & Naomi D.	Williams
93	Jeff & Becky	Grandin
93	Elizabeth	Smigal
93	Joseph D.	Henry
93	Jann	Nugent
93	Leon C.	Johnson
93	Susan & Andy	MacQueen
94	Jeff	Grandin
94	Dan	Sullivan
94	Vincent J.	King
94	James & Heidi	Hamric
94	William	Geary
94	Megan	Padden
94	Janice H.	McCarthy
94	Thomas & Kathleen	Gauss
94	Jonah	Miller
94	Zach	Miller
94	Jonathan	Collom
94	Margaret	Collom
94	Christine	Bible
94	Sonya	Bible

Letter Number	First Name	Last Name
94	Dave	Bible
94	Danielle	Burk
94	Amy	Dulin
94	Rich & Heather	Musselman Musselman
94	Bronwyn	Lewis
94	Donald	Schultz
94	Carolyn H.	Schultz
94	Erica	Long
94	Joseph	Henry
94	Charles	Smith
94	Kimberly	Covert
94	Paul	Grandin
94	Elizabeth C.	Smigal
94	Kate	Friend
94	Allen	Meadows
94	Siobhan	Covington
94	Jerry	Cosner
94	W. D.	Runyon
94	Jann	Nugent
94	Glenda	Crawford
94	J. E.	Kinkaid
94	Ed	Ride
94	Leon	Johnson
94	John & Naomi	Williams
94	Frida & Carney	Ratliff
94	Karen	New
94	Aila M.	Casielma
94	Richard	Horan
94	Sadie	Johnson
94	Joyce	Runyon
95	William K.	Ijo
96	John	Williams
97	John F	Merrifield III
98	Walt R	Shupe
99	Roger	Lundell
100	Joel W.	Foster
101	Eddie	Hinkle
103	Stephen E.	Haid
104	James R.	Good II
105	Stan	Shaver

Letter Number	First Name	Last Name
106	Jim	Good
107	John	Williams
108	Jason	Lab
109	Steve	Nadel
110	Joe	Henry
111	John	Richard
112	Inaudible	Inaudible
113	Ken	Dzaack
114	Bruce	Dalton
115	Peter	Schopel
116	Keith	Strausbaugh
117	Ruth	Gordon
118	Julie	Zach
119	Jason	Webb
120	Mr. (Not Given)	Zach
121	Andie	Dalton
122	Julie	Halperson
123	Carol	Fletcher
124	J.R.	Nolan
125	Steven	Convo
126	Bill	Smith
127	Janet	Preston
128	Paul	Burns
129	Stephen	Kimbrell
130	Not Given	Not Given
131	Stan	Shaver
132	Geraldine	Wilson
133	Leo	Wilson
134	Roger	Lilly
135	Not Given	Not Given
136	Not Given	Not Given
137	Not Given	Not Given
138	Not Given	Not Given
139	Walt	Lesser
140	Barbara Sanders	Hannah
141	Steve	Wilson
142	Not Given	Lindell
144	Tom	Vogel
145	Steve	Haid
146	Joe	Drenning
147	Alex	Lachard

Letter Number	First Name	Last Name
148	Senator Bob	Williams
149	Laurie	Quattro
150	Not Given (probably Stanley E.)	Shaver
151	Jim	Green
152	Kim	Bennett
153	Gary	Verdi
154	Brenda	Miller
155	Jim	Good
156	Not Given	Not Given
157	Not Given	Not Given
158	John	Williams
159	Kim	Not Given
160	Kermit	Bennet
161	Laura	Milam-Hannin
162	Marilyn	Shoenfeld
163	Patrick "Cully"	McCurdy
164	Debbie	Snyder
165	Todd	Romero
166	William D.	Oliver
167	Donald	Schultz
168	Mike	Powell
169	Benjamin A.	Herrick
170	Stephen	Schimpff
171	Mike	Dant
172	Nicholas & Monica	Rumsey
173	Mike & Christi	Dant
174	Frank	Maguire
175	Julie	Dzaack
176	Athey	Lutz
177	Toni & Bill	Witzemann
178	Amy	Cimarolli
179	Matthew	Marcus
180	Pamela	Lutz
181	Helen	McGinnis
182	Karen	Jacobson
183	John	Richard
185	Sherri	Spizzirri
185	Dennis	Labare
186	Julie	Dzaack
187	Chip	Chase
188	Gary	Berti

Letter Number	First Name	Last Name
189	Tom	DeScisciolo
190	Paula Jean	Hallberb
191	Chip	Chase
192	Sara	Lampo
193	Bill	Peterson
194	Bob	Bealem
195	Don	Casper
196	Susan	Pierce
197	Roger	Lilly
198	Jeremy	Golston
199	Joel & Rosemarie	Foster
200	Lee & Brenda	Miller
201	David	Beckner
202	Andrea	Dalton
203	Joseph	Henry
204	Murray G.	Dearborn
205	Curtis I.	Taylor
206	Jennifer N.	Taylor
207	Marilyn	Shoenfeld
208	Peter	Shoenfeld
209	Charlie & Mary	Waters